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2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X  
5 ARLENE J. DELGADO,

6 PLAINTIFF,

7 -against-

8 Case No.:  
9 19-CV-11764

10 DONALD J. TRUMP FOR PRESIDENT, INC., SEAN  
11 SPICER, Individually, REINCE PREIBUS,  
12 Individually and STEPHEN BANNON,  
13 Individually,

14 DEFENDANTS.

15 -----X

16 DATE: June 15, 2023

17 TIME: 9:58 A.M.

18 EXAMINATION BEFORE TRIAL of the  
19 Plaintiff, ARLENE J. DELGADO, taken by the  
20 Defendant, pursuant to a Court Order, held  
21 via videoconference, before Rivka Trop, a  
22 Notary Public of the State of New York.  
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A P P E A R A N C E S:

DEREK SMITH LAW GROUP, PLLC

Attorneys for the Plaintiff

ARLENE J. DELGADO

One Penn Plaza, Suite 4905

New York, New York 10119

BY: JOHN PHILLIPS, ESQ.

-and-

AMY HANNA, ESQ

LAROCCA HORNIK ROSEN GREENBERG, LLP

Attorneys for the Defendant

DONALD TRUMP FOR PRESIDENT, INC., ET AL

40 Wall Street, Fl. 32

New York, New York 10005

BY: JARED BLUMETTI, ESQ.

ALSO PRESENT:

COREY WAINAINA, Videographer

\* \* \*

F E D E R A L   S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED by  
and between the counsel for the respective  
parties herein that the sealing, filing and  
certification of the within deposition be  
waived; that the original of the deposition  
may be signed and sworn to by the witness  
before anyone authorized to administer an  
oath, with the same effect as if signed  
before a Judge of the Court; that an  
unsigned copy of the deposition may be used  
with the same force and effect as if signed  
by the witness, 30 days after service of the  
original & 1 copy of same upon counsel for  
the witness.

IT IS FURTHER STIPULATED AND AGREED  
that all objections except as to form, are  
reserved to the time of trial.

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A. DELGADO

THE VIDEOGRAPHER: Good morning, again, everyone. We are going on the record at 9:58 a.m. eastern time on Thursday, June 15, 2023.

Please note that this deposition is being conducted virtually. The quality of recording depends on the quality of camera and internet connection of the participants.

What is seen from the witness and heard on screen is what will be recorded. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is media unit 1 of the video recorded deposition of Arlene J. Delgado in the matter of Delgado, Arlene versus Donald J. Trump for President, Inc., et al.

This was filed in the United States District Court, Southern District of New York, the case number 19-cv-11764 ATKHP.

My name is Corey Wainaina



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A. DELGADO

representing Veritext Legal Solutions and I am the videographer. The court reporter is Rivka Trop from the firm Veritext Legal Solutions.

I am not authorized to administer an oath, I am not related to any party in this action nor am I financially interested in the outcome.

If there are any objections to proceeding, please state them at the time of your appearance.

Counsel and all present including remotely will now state their appearances and affiliations for the record, beginning with the noticing attorney.

MR. BLUMETTI: Jared Blumetti of Larocca Hornik Rosen Greenberg on behalf of John Donald J. for President, Inc., Sean Spicer, Reince Preibus and Stephen Bannon.

MR. PHILLIPS: John Phillips and Amy Hanna, along with our client Arlene Delgado.

1 A. DELGADO

2 THE WITNESS: Arlene Delgado,  
3 plaintiff, present.

4 A R L E N E D E L G A D O, called as a  
5 witness, having been first duly sworn by a  
6 Notary Public of the State of New York, was  
7 examined and testified as follows:

8 EXAMINATION BY

9 MR. BLUMETTI:

10 Q. Please state your name for the  
11 record.

12 A. Arlene J. Delgado.

13 Q. Where do you reside?

14 A. [REDACTED]  
15 [REDACTED].

16 Q. Good morning, Ms. Delgado. We  
17 represent Donald J. Trump for President,  
18 Inc., Sean Spicer, Reince Preibus and  
19 Stephen Bannon in this lawsuit. For ease of  
20 reference, I am going to refer to Donald J.  
21 Trump for President, Inc. as the Campaign.

22 The process here is  
23 straightforward. I am going to ask you  
24 questions regarding your lawsuit. I just  
25 want to go over a few ground rules. And the

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first already seemed to happen between us.  
Please wait until I finish asking my  
question before you begin to answer, and I  
will wait until you finish speaking before I  
ask you another question.

It will be difficult for the court  
reporter to record what we are saying if we  
speak at the same time. If you don't  
understand one of my questions, please let  
me know and I will rephrase. If you need to  
take a break, that's no problem. If I have  
a question pending, the only caveat is, you  
have to answer that question before taking a  
break.

Please keep all answers verbal.  
The reporter can't take down hand gestures  
and other body language. If you don't know  
the answer to one of my questions, please do  
not guess or speculate. I don't know is a  
perfectly acceptable answer.

While you are using an electronic  
device to participate in this virtual  
deposition, you are not allowed to  
communicate with anyone other than your

1 A. DELGADO

2 attorney during this deposition.

3 Do you understand these rules?

4 A. I do.

5 Q. Is there anyone else in the room  
6 where you are?

7 A. No.

8 Q. Did you review any documents in  
9 preparation for your deposition?

10 A. No.

11 Q. Did you take a look at any of the  
12 documents that have been produced by either  
13 side?

14 A. I actually have not reviewed your  
15 production just yet. I am very busy with my  
16 son, so I guess not.

17 Q. Have you ever been known by any  
18 other names other than Arlene Delgado?

19 A. I use A.J. It is not a different  
20 name, just my initials for conservative  
21 writing, not a different name.

22 Q. What does J. stand for?

23 A. Josephine. It is my communion  
24 name, confirmation, I am Catholic.

25 Q. What is your date of birth?

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A. 06/21/77.

Q. While we are only going to put last four on the record, can you please state your Social Security number for the record?

A. XXX-XX-4056.

Q. Were you born in the United States?

A. Yes.

Q. Which state were you born in?

A. Florida.

Q. Where did you grow up?

A. Miami, Florida.

THE WITNESS: I am just silencing my phone.

Q. For how many years have you lived in Miami, Florida?

A. Well, there was a break. I lived in Miami from the time I was born through high school. Then I went away to college and law school. And then I was in New York for about a decade working after that. And then I returned. So it has not been continuous.

1 A. DELGADO

2 Q. How would you characterize your  
3 ethnicity?

4 A. Hispanic.

5 Q. Are you married?

6 A. I am not.

7 Q. Have you ever been married?

8 A. No.

9 Q. Do you have any children?

10 A. Yes.

11 Q. How many?

12 A. One.

13 Q. And what is his or her name?

14 A. William.

15 Q. And the address that you gave at  
16 the beginning, how long have you lived at  
17 that address?

18 A. Since I returned from New York, so  
19 over a decade.

20 Q. Do you live with anyone at that  
21 address?

22 A. My mom lives here and my son. The  
23 house is sort of divided up into two parts,  
24 and my dad and sister and brother-in-law  
25 have the upstairs part. It is sort of like

1 A. DELGADO

2 a duplex structure. It is an old house.

3 Q. Understood.

4 For how long have you lived with  
5 those individuals since you returned to  
6 Miami, aside from your son?

7 A. Well, my sister and brother-in-law  
8 lived away for a while. But as far as me in  
9 this house, you mean with those individuals  
10 in this house, it is on and off. They have  
11 not always lived upstairs. My mom has been  
12 here since I was 10 in the same house, so.  
13 It is hard to say how -- okay, sorry.

14 Q. That's okay, I am just trying to  
15 get an approximation.

16 Where did you go to high school?

17 A. Coral Gables Senior High. I was  
18 supposed to go to Miami High, but I which  
19 went to Coral Gables for an international  
20 baccalaureate academic program.

21 Q. What year did you graduate?

22 A. 1995.

23 Q. Where did you go to college?

24 A. University of Florida.

25 Q. What did you study at Florida?

1 A. DELGADO

2 A. My degree is in history.

3 Q. What year did you graduate from  
4 UF?

5 A. 1999.

6 Q. And you said that you obtained a  
7 bachelor's of arts in history?

8 A. Yes.

9 Q. Did you obtain any other degrees  
10 from UF?

11 A. No. There was an honorary summa  
12 cum laude designation on it. I don't know  
13 if you want to make a note of that, but no  
14 separate degree.

15 Q. I believe you mentioned before you  
16 went to law school.

17 Where did you go?

18 A. Oh, yes, Harvard Law School.

19 Q. Did you graduate from Harvard Law  
20 School?

21 A. I did.

22 Q. What year?

23 A. 2002.

24 Q. Did you obtain your J.D. from  
25 Harvard?



1 A. DELGADO

2 A. I did.

3 Q. Did you obtain any other degrees  
4 from Harvard?

5 A. No.

6 Q. Such as an LLM?

7 A. I think the LLM who were for  
8 foreign students who had a law degree in  
9 another country and came to Harvard to get  
10 an American J.D., so no.

11 Q. Have you attended any other  
12 educational institutions other than those we  
13 just discussed?

14 A. No.

15 Q. Have you ever been admitted to  
16 practice law in any states?

17 A. Yes.

18 Q. In which states?

19 A. New York.

20 Q. Any others?

21 A. No.

22 Q. Is your registration current in  
23 New York?

24 A. Yes.

25 Q. Have you ever practiced law in New

1 A. DELGADO

2 York?

3 A. Yes.

4 Q. Have you ever worked at any law  
5 firms in New York?

6 A. Yes.

7 Q. Can you please identify the law  
8 firm that you worked in New York?

9 A. Hughes Hubbard & Reed at Battery  
10 Park Plaza and O'Melveny & Myers at 7 Times  
11 Square.

12 Q. And what was your position at  
13 Hughes Hubert?

14 A. Associate.

15 Q. And during which period of time  
16 did you work at Hughes Hubert?

17 A. I think it was -- obviously 2002  
18 to I think I lateraled over to O'Melveny in  
19 2004 or '5, I think '5.

20 Q. You lateraled over as an  
21 associate?

22 A. Yes.

23 Q. You were in that firm from 2005 to  
24 roughly when?

25 A. I believe 2009. I want to say

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A. DELGADO

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2009, I believe.

3

Q. And why did you stop working at  
4 the second firm? I am sorry, can you say  
5 the name again?

6

A. O'Melveny, O--M-E-L-V-E-N-Y.

7

Q. Why did you stop working?

8

A. That's when the recession had hit  
9 in 2008. So the first folks that get the  
10 ask in general at most white shoe law firms  
11 are the mid levels because we are not as  
12 profitable as junior or as important as  
13 senior level attorneys. So they laid off a  
14 big chunk of the mid levels, so.

15

And I had an opportunity to pursue  
16 a matter with a former colleague, so that  
17 made the switch.

18

Q. Have you worked at any law firms  
19 in New York other than those two?

20

A. No.

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Q. Did you have any particular legal  
22 focus or specialties when you worked at  
23 those two law firms?

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A. No. I worked in a variety of  
25 areas. I suppose the way it works at those

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big firms, they kind of rotate you through, unless you have a particular focus that you are really passionate about, and they will kind of work with you. I worked in a variety of areas, litigation, Latin American corporate, anti-trust, to kind of figure out where I would provide the most value, where my interests were. That's kind of the pattern with these associates at these law firms.

Q. Did you ever participate in any litigation of any employment discrimination matters?

A. Oh, I am thinking back. I worked with the employment group for a while. In actual litigation, like a case that was being tried, I don't recall that I did, I don't recall to be honest. One isn't coming to mind, so I want to say no. I don't think I did. We did a lot of transactional work.

Q. That was at both firms?

A. No, at Hughes Hubert -- you are talking about employment law at both firms.

Q. Yes.

1 A. DELGADO

2 A. No, at Hughes Hubert I mostly  
3 focused on Latin America corporate work.

4 Q. What was that opportunity with a  
5 colleague that you referenced before in or  
6 around 2009?

7 A. Yes, a former colleague at  
8 O'Melveny had approached me about a  
9 potential class action he had envisioned  
10 against Apple. And so we spent the next 20  
11 months or so working on that together and  
12 meeting with Apple, et cetera.

13 Q. Was that litigation ever filed?

14 A. No.

15 Q. What were the nature the claims  
16 against Apple?

17 A. I have to keep it vague, since it  
18 was never filed. But it had to do with  
19 their Genius Bar and what was happening when  
20 individuals were connecting their phones at  
21 Genius Bar locations in stores.

22 Q. Following your graduation from law  
23 school in 2002, I believe you said, but  
24 prior to the time you started working for  
25 the Campaign in 2016, did you have any

1 A. DELGADO

2 non-legal jobs?

3 A. Non-legal, no, I did document  
4 review, so that's legal. Not as a paid job,  
5 I started doing a lot of political writing  
6 and commentary, but it was not a job, so no.

7 Q. Did you do any political writing  
8 for any particular publishers, periodicals,  
9 magazines?

10 A. Sure. I had articles published in  
11 the Miami Herald, I think one in the  
12 Washington Post, Media Write, Al Jazeera. I  
13 think there was one with the BBC. Who else?  
14 National Review, American Conservative. I  
15 am probably missing a few, but a good  
16 variety.

17 Q. Is that per diem work for these  
18 publications?

19 A. Yes. Some you received payment,  
20 and some were just done for the sake of  
21 getting your foot in the door, exposure,  
22 getting your name out there.

23 Q. And during which period of time  
24 roughly did you write for these publications  
25 in between 2009 and 2016?

1 A. DELGADO

2 A. I think a lot of it was  
3 concentrated in like 2013, 2012, 2013,  
4 around there. Yes, 2012, 2013 was the bulk  
5 of it.

6 Q. Who is John De Neufville?

7 A. I am sorry, if you want to back up  
8 a second, because you said something through  
9 2016, you didn't ask me about, I want to be  
10 clear, about the legal job that I did from  
11 2014 to 2016, so.

12 Q. I thought I asked that before,  
13 what do you get?

14 A. So after I did the political  
15 writing for a while, then in 2014, in the  
16 middle of 2014, I became the general  
17 counsel, which is also a legal job of ALPFA,  
18 the Association of Latino professionals for  
19 America. And I was in that role, in fact  
20 through the time that I joined the Campaign,  
21 I took a leave from that role. It sounded  
22 like you thought you had the complete legal  
23 career history, but I wanted to make sure  
24 that was.

25 Q. I appreciate that?

1 A. DELGADO

2 A. Sorry.

3 Q. I appreciate the clarity?

4 A. No worries, if you have any  
5 questions about that one, feel free.

6 Q. Where is ALPFA located?

7 A. It had several offices in the U.S.  
8 I think currently they have restructured,  
9 and they are now currently based in Austin.  
10 At the time they had a New York, I think New  
11 York was their main office. And it is a  
12 non-profit. It has been around since 1972,  
13 and their focus is helping Latino young  
14 professionals and Latino college students  
15 with their job search, professional  
16 empowerment development, career search,  
17 promotions. We put together job fairs,  
18 networking events, et cetera. So I was the  
19 general counsel for that.

20 Q. When did you stop working for  
21 them?

22 A. So I took a leave of absence so  
23 that I could work full-time officially on  
24 the Campaign, not just as a surrogate, in  
25 August. And then when everything occurred



1 A. DELGADO

2 with the Campaign not giving me the White  
3 House job, I went back to them. But  
4 obviously it was, it felt very awkward,  
5 given that it is an organization that  
6 promotes Latino empowerment. And I had just  
7 come back from working for a man that said  
8 Mexico sends us criminals, essentially. So  
9 it was not really something, going back and  
10 staying there was no longer really a viable  
11 option.

12 MR. BLUMETTI: I am just going to  
13 move to strike the response to the  
14 extent not responsive.

15 Q. Who is John De Neufville?

16 A. He is a gentleman that I knew  
17 briefly for a decade ago, 2011.

18 Q. Where did you meet him?

19 A. In New York.

20 Q. Please characterize your  
21 relationship to him?

22 A. We had friends in common. And I  
23 didn't really know much about him. We just  
24 had friends in common.

25 Q. Did there come a time where you

1 A. DELGADO

2 were engaged in a romantic relationship with  
3 him?

4 A. I would not call it romantic. I  
5 visited New York one trip after I had moved  
6 back. So one thing lead to another, we were  
7 out, and we ended up spending the night  
8 together. So that's what occurred there.

9 Q. Did there come a time when Mr. De  
10 Neufville obtained an injunction against  
11 you?

12 A. Yes.

13 Q. When?

14 A. 2012.

15 Q. What did that injunction prevent  
16 you from doing?

17 A. I could not contact, I could not  
18 send e-mails to him, I believe. I have not  
19 looked at this in over a decade, but I  
20 believe it is I can't contact him.

21 Q. Are you aware of any other  
22 restrictions that the injunction imposed on  
23 you?

24 A. I don't know if you mean -- there  
25 was one that he obtained by going to court

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and claiming that a letter he had received was from me, which was not from me. I was not notified of the hearing, so I didn't attend that hearing. There was one issue then. And I don't remember what that one said I could or couldn't do. I remember the original one, the one that I did attend the hearing where it was issued, it said don't contact him again. But I don't remember what the other one, because I was not at the hearing where it was issued, said. I think there was probably some restriction in there.

Q. Do you know whether a Florida court ever imposed any travel restrictions on you?

A. Now that you ask that, I think in the one that they issued, the one time I looked at it, I think it said something that I had to notify the court if I flew. I remember doing that before I went up to the war room to work on the campaign. I think the restriction was just to notify the court.

1 A. DELGADO

2 Q. Is that injunction still in  
3 effect?

4 A. Oh, God, no, I don't think so. I  
5 think the day I received it, which again I  
6 was shocked because I was not at the hearing  
7 where it was issued, I think it said it was  
8 something like a five-year order. So it was  
9 already I think five years old at the time I  
10 was or close to being at the time I was on  
11 the Campaign. It was kind of ancient  
12 history for me.

13 Q. What were the facts and  
14 circumstances underlying that injunction  
15 that you did attend preventing you from  
16 contacting him, what happened?

17 A. Sure.

18 So --

19 MR. PHILLIPS: We are going to  
20 preserve some objections on this, I  
21 think it is exceeding relevance. But  
22 certainly, we will give you a little  
23 leeway here.

24 You could answer.

25 A. You said, sorry, the

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A. DELGADO

circumstances?

Q. Just what happened in your words that lead to this injunction being obtained whereby you were not allowed to contact him?

A. Sure, thank you for asking, because I appreciate the opportunity to explain it, just as the FBI clearance form also gives you an opportunity to explain, because sometimes these things are not as they seem.

Without getting into the personal medical history, I became pregnant, the first time I have ever been pregnant. And the second time was Mr. Miller.

I became pregnant, Mr. De Neufville flew down here to try to convince me to terminate the pregnancy, saying he comes from a very high society is how I would qualify it type of family in New York. He said he couldn't have a child with the daughter of a bus driver, that I should be realistic, things of that nature.

Fast forward a bit, I was very -- I am going to relive there this, it was

1 A. DELGADO

2 upsetting what I went through. So I later  
3 heard through the grapevine through friends  
4 in common and people we knew that he and his  
5 girlfriend had kind of been laughing about  
6 my -- how hard a time I was having and how  
7 they pulled one over. So I e-mailed him a  
8 few times saying hey, why am I hearing this,  
9 you said you were going to be supportive,  
10 this is the opposite of that, et cetera.

11 He never wrote back saying don't  
12 e-mail me. I am an attorney, I know if  
13 somebody says stop e-mailing me, you better  
14 stop e-mailing them, never.

15 The next thing I know, a few  
16 months later I get a notification, this  
17 person has filed a restraining order against  
18 you, which I was shocked by. Immediately  
19 that was the first idea I even had that have  
20 he was bothered by these e-mails. I mean,  
21 they were e-mails, I figured if he didn't  
22 want to read them, he would just have them  
23 filter into a junk folder. He didn't allege  
24 that I showed up at his home. I had never  
25 shoed up at his home, never called him,

1 A. DELGADO

2 never called his job, never done anything  
3 with that kind of nature, just e-mails.

4 But I went to the hearing which  
5 took place two months later. By then I  
6 absolutely had stopped contacting him. And  
7 I explained to the judge I didn't know any  
8 e-mails are bothersome. I got emotional  
9 like how I am now when we started to talk  
10 about it. And the judge, I remember this,  
11 said, it sounds like this guy is a bit of a  
12 cat, he had stepped out at that point, so I  
13 am going to, I will do this for you, you  
14 agree to a six-month order. And if you  
15 don't contact him again, we don't have to go  
16 through the hearing now, let's just do a  
17 six-month order, we don't have to do this  
18 hearing, just agree to a six-month,  
19 everybody is behaved, bring the temperature  
20 down, you don't contact him and I will see  
21 you in six months. I said great, thank you,  
22 judge, I shook hand with his attorney. And  
23 I left and I got to work on a book about  
24 politics, which I ended up publishing myself  
25 on Amazon. I kind of dove into that, and

1 A. DELGADO

2 that really helped me get over things. I  
3 was just looking forward to having this  
4 thing sealed.

5 And then again, about three weeks  
6 or a month, I don't remember because it is  
7 so long ago, I can't even bring myself to  
8 look at that stuff. A month out from when  
9 it is finally going to be sealed, I get  
10 something at the house saying you have a  
11 permanent restraining order. I guess they  
12 have to serve you once you have something.  
13 I get it, I said this has to be a mistake,  
14 this has to be a mistake because I am about  
15 to get this sealed. It has to be a clerical  
16 error. So I get in my truck, I drive down  
17 to courthouse. And no, apparently there had  
18 been a month earlier, they proceeded without  
19 me ex-parte, believing I had some help  
20 served later it turns out a U.S. mail letter  
21 had been sent to my home, which I had never  
22 received, in which Mr. De Neufville had  
23 claimed that he had received a letter, which  
24 there was a copy in the file that I got from  
25 the clerk, which looked like magazine, I



1 A. DELGADO

2 will never forget it, it had magazine, that I  
3 remember like yesterday, magazine letter,  
4 like a 1990 serial killer film. And it said  
5 horrible things threatening him. And the  
6 envelope from which it was mailed said  
7 Kansas City. That I also always remember,  
8 because every time I think of Kansas city or  
9 every time I see Kansas City Chiefs, I kind  
10 of think of that. The only time I have ever  
11 been to Kansas City was in 2004 for a  
12 wedding. I clearly did not send this  
13 letter. So I immediately go home, type this  
14 out, file something with the judge saying I  
15 did not do this letter, please redo the  
16 hearing. They said no, restraining order,  
17 for whatever it was, I think it was for like  
18 five years. And that's it. I didn't have  
19 the money, the connections or the time or  
20 the wherewithal or emotional bandwidth to  
21 appeal this. I didn't know an appellate  
22 attorney. And that's what happened.

23 The reason I believe that he was  
24 so desperate to have that six-month TRO  
25 transform into a permanent, and why I

## A. DELGADO

1  
2 believe he and his girlfriend faked this  
3 letter, is there were some things he had  
4 told me about his boss, something he and his  
5 boss had done in St. Barts, criminal  
6 activity, where they left a man for dead who  
7 they were buying drugs from during a wedding  
8 in St. Barts. I believe that is why he was  
9 so worried that some day I would contact the  
10 boss and say, hey, he told me the story  
11 about what you guys did in St. Barts. You  
12 asked me what I think happened there.  
13 That's why I think he was so desperate to  
14 turn it into a permanent restraining order.

15 I don't know if you have  
16 researched the woman he was with, Allison  
17 Weils. She was a convicted felon, who had  
18 just plead in Federal Court, I believe it  
19 was to four different felony counts like a  
20 year earlier, for eavesdropping, hacking  
21 voicemails of love rivals. And John had a  
22 severe cocaine problem. I mean, when he was  
23 here in Miami, he was asking the maitra d at  
24 Casa Tua where he could find Coke. I have  
25 never done any drugs. So for me that was

1 A. DELGADO

2 also -- my gosh, what a bad guy I ended up  
3 getting pregnant from, just bad news all  
4 around.

5 Sorry for the long-winded answer,  
6 but you asked what happened there. It is a  
7 real sad kind of tragic story that I ended  
8 up with this. So I think when I get a  
9 chance to explain as I would have done on my  
10 form to the FBI, I did nothing wrong, other  
11 than send this guys some e-mails when I was  
12 upset. I never threatened him, I never  
13 showed up at his house, never called him,  
14 never called his place of work. And then  
15 through no fault of mine I was somehow  
16 framed on a basis of a single letter sent  
17 anonymously from somewhere I have been once  
18 years earlier for a wedding. I was given a  
19 five year restraining order. But I would  
20 have had the chance to explain that.

21 And thank you for asking, so I  
22 have had the chance to explain it here.

23 Q. I am just going to show you some  
24 documents.

25 I am going to share my screen with

1 A. DELGADO

2 you?

3 THE VIDEOGRAPHER: For the final  
4 video record, would you like it witness  
5 only or witness and the document?

6 MR. BLUMETTI: Witness only.

7 I am going to share my screen and  
8 mark this as Defendant's Exhibit A.

9 (Whereupon, a 16-page document DEF  
10 132 through DEF 147 was marked  
11 Defendant's Exhibit A for  
12 identification as of this date by the  
13 reporter.)

14 Q. Can everybody see this?

15 A. I see it.

16 Q. I am going to show you a 16-page  
17 document that has been Bates stamped DEF  
18 2132 through 2147.

19 Please take a look at this  
20 document, do you recognize it?

21 A. No, I mean, it looks like it is  
22 something from that matter, but I don't  
23 recognize this.

24 Q. It purports to be an order dated  
25 December 4, 2012, denying a motion, sorry

1 A. DELGADO

2 for jumping around, I just want to show you  
3 the date, denying a motion that you made to  
4 vacate that injunction that was obtained  
5 against you. The opening paragraph, the  
6 Court refers to vexatious, seemingly never  
7 ending and indisputably unwanted vitriolic  
8 communications.

9 Those e-mails that you referred to  
10 before, would you characterize any of those  
11 as vexatious?

12 A. Well, I will tell you the problem  
13 with you quoting this.

14 Q. Okay?

15 A. As I told you earlier, they held  
16 an ex parte hearing, the record shows it was  
17 an ex parte hearing. The e-mails  
18 quote-unquote, e-mails that were put into  
19 the file, I didn't recognize a good, good  
20 chunk of them. That I remember from when I  
21 looked. So when the judge refers to  
22 vexatious communications, those are e-mails  
23 that were never authenticated. He is  
24 relying on what Mr. De Neufville claims are  
25 e-mails from me, just like he relied on a

1 A. DELGADO

2 letter that Mr. De Neufville claimed was  
3 from me.

4 Q. I understand your point, let me  
5 ask you this, did you ever send any e-mails  
6 to Mr. De Neufville which you would  
7 characterize as vexatious?

8 A. Not at all. In all of them they  
9 had a legitimate purpose, I was asking,  
10 please, why am I hearing that you are  
11 talking about me, please don't do that, who  
12 have you spoken to about this, please  
13 answer, I would like to talk about this, not  
14 at all vexatious.

15 I don't know what the judge was  
16 shown, because I was not at that hearing.

17 Q. You raised an authenticity. So I  
18 am going to show you one of the e-mails.

19 MR. BLUMETTI: I am still sharing  
20 my screen. We could mark this as  
21 Defendant's Exhibit B. This is Bates  
22 stamped DEF 2221.

23 (Whereupon, an e-mail Bates  
24 stamped DEF 2221 was marked Defendant's  
25 Exhibit B for identification as of this

1 A. DELGADO

2 date by the reporter.)

3 Q. It purports to be an e-mail that  
4 you sent to Mr. De Neufville in February of  
5 2012, please give this a read?

6 A. I am not go to be able to tell you  
7 much about this, because I see it is an  
8 e-mail from 2012.

9 Q. Did you ever have an e-mail  
10 address named arlenedelgado0621@gmail.com?

11 A. It sounds familiar, but I can't  
12 say for certain if it was. It sounds  
13 familiar. It is going back over a decade.

14 Q. You referenced Mr. De Neufville's  
15 girlfriend before, is this the same  
16 girlfriend you are referring to?

17 A. In the e-mail, I don't know how I  
18 can answer that.

19 Q. Directing your attention to the  
20 first sentence of the second paragraph, it  
21 says, "Didn't peg you for the type to date J  
22 JAPs, as you call them (hum, not very high  
23 society of you-shouldn't you stick to WASPS  
24 at least?)

25 What is a JAP?

1 A. DELGADO

2 MR. PHILLIPS: Objection to form.  
3 Now we are way past relevance.

4 Do you want to give a good-faithed  
5 basis for this line of inquiry? Again,  
6 we are going into an injunction  
7 depending on what the campaign knew at  
8 the time. But hashing through these  
9 e-mails is just way overbroad.

10 MR. BLUMETTI: I disagree. These  
11 e-mails form the facts and  
12 circumstances of the injunction, which  
13 we maintain would have prevented  
14 employment in the White House  
15 ultimately should it have gotten to  
16 this point. We had a conference with  
17 Magistrate Parker on this issue. They  
18 are relevant. We can speak to  
19 Magistrate Parker on this issue if you  
20 want. I am going to ask some questions  
21 regarding these e-mails. It is not  
22 going to take very long. But they are  
23 relevant and I am going to ask them.

24 MR. PHILLIPS: I am not objecting  
25 to the e-mails. I am objecting to



1 A. DELGADO

2 characterizations within them on a  
3 witness that has already testified that  
4 she doesn't specifically recall them.

5 MR. BLUMETTI: This is an e-mail  
6 sent from Arlene Delgado, I understand  
7 it was in from 2012, I am asking in her  
8 own words what was meant by the word  
9 JAP.

10 MR. PHILLIPS: I will object to  
11 form.

12 Q. Ms. Delgado, you could answer?

13 A. Again, I don't know if I sent this  
14 e-mail. So I don't know what I could tell  
15 you what the person who wrote that e-mail  
16 meant.

17 Q. Are you familiar with the phrase  
18 JAP?

19 A. Yes, because it was a phrase  
20 that -- Mr. De Neufville, being -- it is  
21 possible that I would have, it is possible  
22 that I would have used that in an e-mail to  
23 him because Mr. De Neufville specifically  
24 made comments of that type, I do recall  
25 that, to me about highlighting my hair. He

1 A. DELGADO

2 had spent a lot of time in California. And  
3 he said to me, I think about this when I get  
4 my hair highlighted, that it didn't look  
5 natural on me, it looked about as natural as  
6 the Mexicans in East L.A. That was kind of  
7 the abusive comments he would make when he  
8 was here.

9 Q. Further down in the paragraph the  
10 e-mail reads, I have seen Mexicans in east  
11 L.A. who look more like natural blondes, is  
12 that what you were referring to?

13 A. That was a comment that he had  
14 made. But I can't tell you if this whole  
15 e-mail as provided was something that I  
16 wrote because of the letter they have sent  
17 and because there is no way for me to  
18 authenticate that this exact e-mail is an  
19 accurate copy of something I sent.

20 Q. Do you dispute writing or sending  
21 this e-mail, Ms. Delgado?

22 A. I have no way to know if I did. I  
23 don't know how to answer your question.

24 Q. Beyond the fact that it says your  
25 name here, you think you might have had an

1 A. DELGADO

2 e-mail address with this address, you  
3 admitted to sending certain e-mails to  
4 Mr. De Neufville in and around this time, do  
5 you have any good-faith basis to dispute  
6 that this is your e-mail?

7 A. Yes, my good-faith basis is that  
8 he and Ms. Weiles, due to her criminal  
9 record, his drug addiction, their  
10 desperation to have a restraining order so I  
11 wouldn't contact his job, which they thought  
12 I might do, very well could have edited  
13 parts of an e-mail that nonetheless uses an  
14 e-mail address that does seem familiar to  
15 me, I am not going to sit here and say yes,  
16 because that e-mail looks familiar, I wrote  
17 every word as you are showing it to me on  
18 that page and as Mr. De Neufville claimed.  
19 These are people who faked a letter and  
20 mailed it and used that as a basis to get a  
21 court order. They are not above equally the  
22 same way altering e-mails or outright  
23 fabricating an e-mail.

24 I wish I could tell you there is a  
25 way for me to check. There is a comment in

1 A. DELGADO

2 there that rings like something he said that  
3 I would throw back at him that I did in  
4 person. But the rest, I can't. There is no  
5 way for me to authenticate this 12 years  
6 later.

7 MR. BLUMETTI: I am going to show  
8 you another e-mail that is marked as  
9 Defendant's Exhibit C. It is Bates  
10 stamped DEF 2227.

11 (Whereupon, an e-mail Bates  
12 stamped DEF 2227 was marked Defendant's  
13 Exhibit C for identification as of this  
14 date by the reporter.)

15 Q. This document purports to be an  
16 e-mail from your name to an individual named  
17 Topper, Sasha Levian and John De Neufville  
18 on March 23 of 2012?

19 A. That's what the screen shows.

20 Q. Who is Topper?

21 A. Topper was a friend in common. He  
22 is another, another person in that little  
23 high society, we are better than everyone  
24 group.

25 Q. How about Sasha, is that the same?

1 A. DELGADO

2 A. I would qualify him as the same,  
3 yes.

4 Q. In the bottom of the e-mail it  
5 looks like it was highlighted, it reads,  
6 that you would be moving back to New York  
7 next week and that you look forward to many  
8 ugly run-ins through the year?

9 A. That's what it says.

10 Q. What did you mean by ugly run-ins?

11 MR. PHILLIPS: Object to form.

12 A. Same answer as before.

13 Q. What is the answer?

14 A. I can't tell you if I wrote that  
15 or not. I would honestly tell you if I did,  
16 because I have no reason to at this point,  
17 there is nothing really particularly to hide  
18 here. But I can't be shown an e-mail, it is  
19 2023, you are showing me an e-mail from 2012  
20 asking me if I wrote it. In good faith, I  
21 can't tell you if I did or not, or if any  
22 word is as written or if there was not a  
23 sentence edited or a word edited.

24 Q. Did you ever intend to send a  
25 threatening e-mail to Mr. De Neufville,

1 A. DELGADO

2 regardless of if it is this one or not?

3 A. Did I ever intend to send him a  
4 threatening e-mail? No, never.

5 Q. I believe you referred to earlier  
6 that one of Mr. De Neufville's girlfriends  
7 used cocaine.

8 In the last sentence of the e-mail  
9 it says it has helped that he is wound up  
10 with a use-up coke head, criminal in her mid  
11 30s. Who is this individual that you are  
12 referring to in this e-mail?

13 MR. PHILLIPS: Object to form.

14 A. When you say I am referring to it,  
15 I don't know if that sentence as written is  
16 written by me exactly as written or not. So  
17 I don't know if you are trying to trick me  
18 into saying I wrote that. I don't know.  
19 This is 11 years ago.

20 Q. I am not trying to trick you?

21 A. That certainly is a sentiment that  
22 I would -- the drug addiction is something I  
23 certainly didn't applaud. But did I write  
24 that? I don't know.

25 Q. How did you know that this

1 A. DELGADO

2 individual used cocaine?

3 A. I had seen her separately from him  
4 at a club called Avenue that a lot of us  
5 went to. And I walked in on her in the  
6 bathroom doing cocaine under the toilet.

7 Q. Have you ever used cocaine?

8 A. Never. I have never used any  
9 drugs. I am not saying that makes me better  
10 than anyone, but I think a little bit more  
11 trustworthy.

12 MR. BLUMETTI: I am going to show  
13 you an e-mail marked as Defendant's  
14 Exhibit D. This one is Bates stamp DEF  
15 2240 to 2241.

16 (Whereupon, an e-mail Bates  
17 stamped DEF 2240 to 2241 was marked  
18 Defendant's Exhibit D for  
19 identification as of this date by the  
20 reporter.)

21 Q. This e-mail purports to be from an  
22 A Delgado with an e-mail address  
23 a\_delgado15@yahoo.com, have you ever used  
24 that e-mail address?

25 A. No. And that one doesn't even

1 A. DELGADO

2 seem familiar to me, that's not even a  
3 number 15, that's not a number I use on  
4 anything, A\_Delgado15, no.

5 Q. Do you dispute ever having this  
6 e-mail address?

7 A. Yes. That doesn't sound familiar  
8 to me at all. The other one at least it  
9 rings a bell. This one Delgado 15, I have  
10 never used that number on a pin, on  
11 anything, so.

12 Q. Do you have dispute sending this  
13 e-mail to Mr. De Neufville on March 23 of  
14 2012?

15 A. Again, I can't say either way. I  
16 don't know how to answer when you are  
17 showing me something, did you send this 11  
18 years ago? How does someone answer that?

19 Q. Do you have any recollection of  
20 sending lengthy e-mails to Mr. De Neufville  
21 in or around March of 2012?

22 A. I am sure some of the e-mails is  
23 what you would qualify as lengthy, maybe. I  
24 could have possibly sent a lengthy e-mail.  
25 This one, and everything written in this



1 A. DELGADO

2 one, can you say you wrote that? Of course  
3 not, I don't know, 11, 12 years back.

4 Q. In the middle of third paragraph  
5 it reads, "At best, some 15 year old gay kid  
6 who follows Paris and sees she is in a  
7 picture with her. Then again, no one even  
8 cares what "old news" Paris is up to, poor  
9 Paris and her down-syndrome looking sister.  
10 She is almost as ugly as your girlfriend."

11 Do you dispute sending these words  
12 to Mr. De Neufville?

13 MR. PHILLIPS: Same objection.

14 A. I am giving the same answer as  
15 before. I don't know how to answer your  
16 question, whether you dispute or admit over  
17 a decade later, asking if words on a screen  
18 were written by me over a decade later when  
19 I am getting over a pregnancy. I am here in  
20 good faith and I am under oath. I can't say  
21 I wrote it or didn't or how to answer that.

22 Q. I only have a few more of these  
23 e-mails. I am not going to spend too much  
24 more time on this. I would like an answer  
25 to whether or not you dispute saying these

1 A. DELGADO

2 words to Mr. De Neufville; yes or no?

3 MR. PHILLIPS: Objection, asked  
4 and answered.

5 A. The same answer as before.

6 Q. You have no memory of sending  
7 this?

8 A. Oh, absolutely not. I have no  
9 memory of a lot of that period. You are not  
10 a woman, sir, you have never been pregnant,  
11 you have certainly never gone through what  
12 it feels like after a pregnancy to have  
13 somebody talking about you. I guarantee you  
14 wouldn't have much memory of what you said  
15 or what you were feeling, hopefully not  
16 because it is a shitty thing to go through.

17 MR. PHILLIPS: Listen to the  
18 questions. Don't get personal with the  
19 attorney. Remember what we talked  
20 about, the longer you answer, the  
21 longer you engage with the attorney who  
22 is just trying to do his job, I am  
23 saying this on the record, that it is  
24 just going to make everything longer  
25 and more drawn out.

1 A. DELGADO

2 THE WITNESS: He did just say he  
3 only has a few more to go through. But  
4 I see on the tabs there is quite a few.  
5 Okay, they will do that, I hope they  
6 did the same with Rob Corridor.

7 MR. BLUMETTI: I am going to mark  
8 this e-mail as Defendant's Exhibit E.  
9 This is one that is Bates stamped 2253.

10 (Whereupon, an e-mail Bates  
11 stamped DEF 2253 was marked Defendant's  
12 Exhibit E for identification as of this  
13 date by the reporter.)

14 Q. This one has the e-mail address  
15 that you did recognize  
16 arlenedelgado21@gmail.com, November 13 of  
17 2011?

18 A. No, I think the earlier one was  
19 0621.

20 Q. Say that again, Ms. Delgado?

21 A. I think it was 0621, but sure.

22 Q. Do you recognize this e-mail,  
23 arlenedelgado21@gmail.com?

24 A. Not particularly. But that  
25 doesn't mean anything, because it is so long

1

A. DELGADO

2

ago.

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Q. At the bottom of the first paragraph it says, "I will never forget that 4:30 a.m. Friday morning text for the rest of my life. Three Xanax a day for three days have done nothing to help me."

Are these your words, Ms. Delgado?

A. The same answer as before.

Q. Have you ever taken Xanax?

A. Yes. That's not an illegal drug.

Q. I am not saying it is?

A. Oh, okay.

Q. Have you ever taken Xanax?

A. Yes, I believe the doctor, at the time I was so anxious and nervous, had prescribed some. My main pediatrician, had said here, try these. Three Xanax a day, I don't think I ever took three Xanax a day. To the extent I said something like that, I was probably being dramatic. And I don't know if I wrote this myself. I think most people at some point have taken a Xanax to sleep or whatnot.

Q. Did you ever ask anyone to send

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A. DELGADO

any e-mails to Mr. De Neufville on your  
behalf?

A. I don't believe so, no. Again,  
going back 11 years, it is possible, I don't  
think so. I tend to handle things myself.  
I don't think so. Maybe, I don't know.

MR. BLUMETTI: Let's mark this one  
Exhibit F. This one is DEF 2257 to  
2258.

(Whereupon, an e-mail Bates  
stamped DEF 2257 to 2258 was marked  
Defendant's Exhibit F for  
identification as of this date by the  
reporter.)

Q. This e-mail purports to be from  
the e-mail address  
arlenedelgado21@gmail.com, dated October 29  
of 2011?

Who is Cabell Brown?

A. Cabell Brown, it is Cabell,  
Cabell, he was a friend of mine of that  
group. I recognize that name.

Q. Did you ever exchange e-mails with  
Cabell Brown?

1 A. DELGADO

2 A. I think we used to mostly text,  
3 but it is possible I had his G-mail at some  
4 point, I don't know. I am getting too close  
5 to the screen in trying to read.

6 Q. Do you recall sending this e-mail  
7 to Cabell Brown?

8 A. The same answer as before, I am  
9 sorry. When you asked me if I recall seeing  
10 an e-mail, it is not do you recall some of  
11 this e-mail, it is as shown to you every  
12 word, do you recall sending this, and it is  
13 impossible to answer that 11 years later.

14 Q. I will ask you a more specific  
15 question. The bottom of the first page it  
16 says, "I haven't behaved perfectly I know.  
17 I do not want to see a counselor next week  
18 to work on why I fire off e-mails and text  
19 the way I do and how to control that."

20 Are these your words?

21 A. I sure as heck can't say they are  
22 11 years later.

23 Q. Did you ever treat with any  
24 provider for the manner in which you send  
25 e-mails or texts?

1 A. DELGADO

2 A. No, never. That I would remember.

3 Q. On the second page, the last  
4 paragraph, it says, "If you want anyone on  
5 your side, isn't a crazy psycho bitch the  
6 best ally? Love A"?

7 A. That's funny.

8 MR. PHILLIPS: Is there a  
9 question?

10 Q. Are these your words?

11 MR. PHILLIPS: Same objection.

12 A. Same answer, I am not trying to be  
13 difficult here, but I don't know. It is a  
14 funny comment, but that's my own observation  
15 here.

16 MR. BLUMETTI: Let's mark this  
17 Exhibit G.

18 (Whereupon, an e-mail Bates  
19 stamped DEF 2288 was marked Defendant's  
20 Exhibit G for identification as of this  
21 date.)

22 MR. BLUMETTI: This one is Bates  
23 stamped DEF 2288. This is the e-mail  
24 you referred to before  
25 arlenedelgado0621@gmail.com as opposed

1 A. DELGADO

2 to 21@gmail.com.

3 Q. Do you recognize this e-mail  
4 address?

5 A. It seems familiar, that one does  
6 seem familiar, the e-mail.

7 Q. Did you send this e-mail to Mr. De  
8 Neufville?

9 MR. PHILLIPS: Same objection.

10 A. Same answer. I don't know who a  
11 Lizzie is.

12 Q. Lizzie Grubman, do you know who  
13 that individual is?

14 A. No, are you able to tell me?

15 Q. I was asking you.

16 A. I said no.

17 Q. In the first sentence it reads,  
18 "The poor man, Lizzie Grubman, both Jewish,  
19 both fake blondes, both over the hill, but  
20 Lizzie has clout, is actually wealthy, a  
21 stellar career. This woman has nothing of  
22 the sort."

23 Are these your words?

24 MR. PHILLIPS: Same objection.

25 A. Same. And I don't know who the



1 A. DELGADO

2 Grubman, is that a B?

3 Q. G-R-U-B-M-A-N.

4 A. I don't know who that is. That  
5 name does not ring a bell.

6 Q. In your opinion, is this e-mail  
7 antisemitic?

8 MR. PHILLIPS: Objection. I am  
9 going to direct my client not to answer  
10 that.

11 MR. BLUMETTI: I don't believe  
12 that's a proper objection, sir.

13 MR. PHILLIPS: I am objecting and  
14 directing my client not to answer. You  
15 could take it up with the judge. You  
16 are getting my client to espouse on an  
17 opinion on whether something that she  
18 can't verify she wrote is antisemitic  
19 or not. She is not an expert. It is  
20 an improper question.

21 MR. BLUMETTI: We will mark that  
22 one for a ruling. We could move on.

23 (Whereupon, an e-mail Bates  
24 stamped DEF 2289 to 2290 was marked  
25 Defendant's Exhibit H-1 for

1 A. DELGADO

2 identification as of this date.)

3 MR. BLUMETTI: This is Bates  
4 stamped DEF 2289 to 2290. It is  
5 document purported to be sent from  
6 another e-mail address,  
7 adelgado000@yahoo.com.

8 Q. Do you recognize this e-mail?

9 A. No.

10 Q. Do you recall having more than one  
11 e-mail address in or around 2012?

12 A. Eleven years ago, no, I have no  
13 idea. I generally don't have different  
14 e-mails.

15 Q. Is it fair to say that the only  
16 e-mail address you do recall using is  
17 arlenedelgado0621@gmail.com?

18 A. That one rings a bell. I am being  
19 honest, that one rings a bell. These others  
20 don't, but the 0621 rings a bell in my mind.

21 Q. The opening paragraph says, "Don't  
22 bother, knock yourself out in sending I am  
23 sorry flowers to your cheap ass peasant of a  
24 girlfriend. A 34-year-old fug face loser,  
25 with nothing going on for her, except a fag

1 A. DELGADO

2 like you, who is the only guy in New York,  
3 apart from the 18 year old queen, who gives  
4 a shit to date someone like that."

5 A. I would never have written that.

6 Q. My question was did you write  
7 these words?

8 A. No. Again, it would be awkward  
9 for me to say 12 years out or yes. But I am  
10 pretty darn sure, those aren't words that  
11 would have come out of my mouth. Most of  
12 what you showed me are not words that would  
13 have come out of my mouth or that I would  
14 have written.

15 Again, these are individuals who  
16 faked a letter to get a restraining order,  
17 they were not above faking or altering  
18 e-mails.

19 Q. Do you know how many e-mails were  
20 alleged to have been sent to Mr. De  
21 Neufville and his friends in 2011 and 2012?

22 A. I remember at the hearing his  
23 attorney showed up and said that they had  
24 like a pile. But then they never showed me  
25 any of them. So it seemed to be like, I

1 A. DELGADO

2 know I shouldn't use hand gestures, it  
3 seemed to be like a big folder that they  
4 had. But they never showed them or never  
5 said like a number or gave me dates or  
6 anything.

7 Q. Directing your attention back to  
8 the original Exhibit A, let's scroll quickly  
9 to page 4, and move onto the next topic. At  
10 the bottom it says, "At the conclusion of  
11 this October 22 hearing, this Court made  
12 findings of fact and entered a permanent  
13 injunction for protection against repeat  
14 violence with a termination date of  
15 October 22, 2017."

16 Does this refresh your  
17 recollection as to the date on which the  
18 injunction was to terminate?

19 A. That sounds right. I know it was  
20 like around the end of the year, because I  
21 was eagerly awaiting that date so I could  
22 tell the judge, hey, the months have passed,  
23 you could seal it now. That sounds right.  
24 I know it was like October, November, yes.

25 Q. On the top of page 5, do you see

1 A. DELGADO

2 it, Ms. Delgado?

3 A. Yes. I am getting a glare. I  
4 want to make sure, go ahead.

5 Q. I asked you before about travel  
6 restrictions. The Court refers to the  
7 following notations on its memorandum of  
8 disposition, "Respondent was notified on  
9 petitioner's motion for a permanent  
10 injunction, based on respondent's contact  
11 and e-mails and letters, et cetera. Clearly  
12 respondent is obsessed with petitioner and  
13 his girlfriend. Court also provides  
14 respondent must notify Court ahead of any  
15 travel by respondent to the New York area."

16 Does this refresh your  
17 recollection as to whether the Court ever  
18 issued any travel restrictions on you?

19 A. Yes. And that's what I remembered  
20 earlier. I remember sending like a letter  
21 before I headed up to work in the war room,  
22 I sent a letter stating to the Court stating  
23 that I would be on and off in New York.  
24 Yes, I remember that, good, I am not going  
25 crazy.

1 A. DELGADO

2 Now that I am looking at it, there  
3 was also something even about like guns,  
4 which was the crazy thing, all based on one  
5 letter, which any judge I think should have  
6 reasonably seen wasn't written by me. There  
7 was also something about not owning guns.  
8 That also comes to mind now.

9 Q. Did you travel to New York at all  
10 between October of 2012 and October of 2017?

11 A. Yes, yes. But I notified the  
12 Court, I did send in that letter. They were  
13 aware..

14 Q. That was my next question, did you  
15 notify the Florida Court each time you  
16 traveled to New York during that time  
17 period?

18 A. No, in fact, since I know it would  
19 be on and off, on and off, and it takes long  
20 for letters to arrive, so I said I would be  
21 there through the election. I thought that  
22 was more generous, just I am going to be  
23 there most of the time through X date. And  
24 I believe Mr. De Neufville must have been  
25 notified, because I am sure they saw me on

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A. DELGADO

TV doing media hits out of New York. To my knowledge, unless the Court didn't tell me, he never complained and said hey, she is in New York and she didn't say anything.

Q. How did you notify the Florida Court when you got to New York? Was it in writing?

A. I sent it a letter, yes, certified mail.

Q. Do you have copies of any of these writings?

A. The order you are showing me?

Q. Do you have copies of any of the writings that you sent to the Florida Court regarding an anticipated or actual travel to New York?

A. It was one letter, it was not writing. It was one letter saying that I would be in there, I think it was August, August through the election, and possibly after we win. I probably kept the certified mail receipt then. I would have mailed that in six years ago. I don't think I have that in any box. I presume there is a copy if

1 A. DELGADO

2 the clerk scanned it into the file.

3 MR. BLUMETTI: Mark this as H-2.

4 (Whereupon, a Court document was  
5 marked Defendant's Exhibit H-2 for  
6 identification as of this date by the  
7 reporter.)

8 Q. I see you are reading this  
9 document. Do you recognize this one?

10 A. I don't recognize this one. But  
11 if you are telling me it is in the file, I  
12 must have sent it. But I guess it shows I  
13 did comply, and I would notify when I would  
14 be in New York. I did the same one. It  
15 should be in there, if they scanned it.

16 The Miami-Dade Family Court system  
17 is not the most organized, so I don't know.

18 Q. This one is from May '13, so this  
19 is quite a long time before the campaign?

20 A. Yes.

21 Q. You referenced your profession and  
22 work that is based in New York.

23 Is that what you were referring to  
24 as the writing publications at that time?

25 A. Going back to 2013 I am not sure



1 A. DELGADO

2 what this referred to. But I am guessing it  
3 was probably -- oh, I think I know what that  
4 was now. Sean Hannity kept inviting me to  
5 come do hits in person. He liked my  
6 writings and political commentary out of Fox  
7 News in New York. Given this was 2013, I  
8 bet that that's what it is referring to.  
9 Yes, it says as a writer.

10 Q. I don't want you to guess, only if  
11 you know?

12 A. I am fairly certain. I said this  
13 is going back a long time. Given it is 2013  
14 that I reference writer and professional  
15 commitments that require my travel to New  
16 York, that would probably be the Fox News  
17 asking me to come up.

18 Q. Did you ever tell Fox News about  
19 the injunction with Mr. De Neufville?

20 MR. PHILLIPS: Objection.

21 A. I don't believe I did. I would  
22 have no reason to.

23 Q. Did you ever tell Fox News about  
24 the fact that you had sent a letter advising  
25 the Florida Court that you were traveling to

1 A. DELGADO

2 New York?

3 MR. PHILLIPS: Objection.

4 A. I don't believe I would have  
5 because there is no reason to. I did tell  
6 Sean Hannity about it. And he thought it  
7 was funny that I was even embarrassed or  
8 apologetic. And he said it seemed like I  
9 was the victim in a really bad situation.

10 Q. Do you recall when that  
11 conversation occurred?

12 A. It would have been -- I was good  
13 friends with Sean in that like 2013 or 2014  
14 period, 2013-ish.

15 MR. BLUMETTI: It is Exhibit I, I  
16 would like to mark, this is DEF 2210.

17 (Whereupon, a letter DEF 2210 was  
18 marked Defendant's Exhibit I for  
19 identification as of this date.)

20 Q. This is another letter, it looks  
21 like it is from July 7, 2014.

22 Did you ever have a number such as  
23 the one set forth on this Exhibit I?

24 A. Yes, that is the cell phone number  
25 I had for years until I switched providers

1 A. DELGADO

2 some years ago. That I know. My old cell  
3 phone number, that I can recognize and  
4 confirm for you.

5 Q. Do you recognize this letter, do  
6 you know whether you wrote this one?

7 A. I don't recognize it. But I  
8 trust, it is so bland, that I trust nobody  
9 has edited this. I am sure this is probably  
10 something I sent in.

11 Q. This one doesn't reference any  
12 work per se. Do you recall why you traveled  
13 to New York in July of '14?

14 A. Given the dates, yes, I would have  
15 just joined ALPFA. So even though my work  
16 was going to be, our whole team was virtual,  
17 remote based, I was probably going up for  
18 some sort of team meeting or orientation of  
19 such at the New York office given the date,  
20 because I joined them in June of 2014.

21 Q. Did you travel to New York in  
22 2015?

23 A. I don't know, I can't recall.

24 Q. Did you travel to New York in  
25 2016?

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A. I am trying to think, because I was already a surrogate for the Campaign. I don't think I did any New York based hits in 2016. And I don't think the ALPFA job earlier in the year required New York. I don't recall. But I don't think so. I am not sure.

Q. You mentioned before that you had sent a letter to the Florida Court advising of anticipated travel to New York to work on the campaign; is that true?

A. Yes, the same as I always did, as you see here. I am curious if that's coming out.

MR. BLUMETTI: We don't have that one. We are going to call for that one, to the extent it is your possession, custody and control, any writings that you sent to the Florida Court for any anticipated travel to New York for work on the campaign.

THE WITNESS: I would not have kept that, certainly six years later, there is no reason to. Mr. De

1 A. DELGADO

2 Neufville clearly had no objection to  
3 mine being in New York, because he knew  
4 I was not a threat. Clearly I would  
5 not have kept that.

6 MR. BLUMETTI: We will make our  
7 demands in writing, and your attorney  
8 will have an opportunity to respond.

9 THE WITNESS: Can I get up a  
10 second to turn down that window so I  
11 don't have to hold my hand to see the  
12 screen? Unless you don't mind mine  
13 doing this, because then the light is  
14 going to be dark.

15 MR. BLUMETTI: That's up to you.

16 THE WITNESS: I will just hold it  
17 like this, I don't know if it is  
18 distracting to you, as long as you  
19 could see me.

20 MR. BLUMETTI: You could close the  
21 blind.

22 THE WITNESS: Thank you, one  
23 second.

24 MR. BLUMETTI: Now it is a little  
25 too dark.

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A. DELGADO

THE VIDEOGRAPHER: The camera  
adjusted its brightness it is good.

MR. BLUMETTI: Mark this as J.

(Whereupon, First Amended  
Complaint was marked Defendant's  
Exhibit J for identification as of this  
date by the reporter.)

Q. I am going to show you a document  
marked as Defendant's Exhibit J. This  
document purports to be the First Amended  
Complaint that was filed on your behalf on  
March 28 of 2022.

Do you recognize this document,  
Ms. Delgado?

A. Well, I presume based on the  
heading that it is an accurate copy of my  
amended complaint. I am going to go on  
faith and I say I do.

Q. It has a Bates stamp at the top  
showing that this was filed by PCF on March  
28.

Did you review this document  
before it was filed? I will give you a  
chance to look through it.

1 A. DELGADO

2 A. It is kind of long.

3 Q. Do you recall reviewing an Amended  
4 Complaint in this lawsuit before it was  
5 filed?

6 A. I don't know if I reviewed the  
7 final version. I am sure I probably  
8 discussed over the phone with my attorney.  
9 It is hard to say if I have reviewed this  
10 exact.

11 Q. Did you participate at all in the  
12 drafting of this pleading?

13 A. Giving thoughts, yes.

14 Q. Actually putting, using a computer  
15 screen, did you type any of these up?

16 A. Did I type the complaint?

17 Q. Yes.

18 A. I don't think my attorneys would  
19 have let me type the complaint myself, no, I  
20 don't think so. I mean, to the extent  
21 maybe -- I don't want to say for sure,  
22 because to the extent they might have sent  
23 me a draft and I might have said there is a  
24 typo here, does that count as what you are  
25 asking as typing?

1 A. DELGADO

2 Q. No. I was more asking if you  
3 participated in any substantive drafting of  
4 any of the factual allegations?

5 A. Not in the typing of them.

6 Q. I am directing your attention to  
7 paragraph 16 on page 3.

8 It says, "Shortly after Donald J.  
9 Trump announce his candidacy for present in  
10 2015, Ms. Delgado became one of his  
11 earliest, most loyal and most vocal  
12 supporters at a time when almost no  
13 political writers or pundits were willing to  
14 publicly support him."

15 Why did you support Mr. Trump for  
16 president shortly after he announced his  
17 candidacy?

18 A. Well, I always liked Donald Trump.  
19 I had always grown up, my dad is a big  
20 believer in him, he is a fellow New Yorker  
21 from the Bronx. My dad is Puerto Rican and  
22 Cuban, and Mr. Trump is from Queens. So I  
23 had always grown up hearing about Donald  
24 Trump. And it was just kind of his policies  
25 position was everything that I had advocated



## 1 A. DELGADO

2 for, especially the fact that he was a  
3 republican was anti-war, and was saying all  
4 that I wanted to hear about the falling of  
5 Iraq war, et cetera. But at the same time  
6 was realistic about the need to have firmer  
7 economic policies. His position on Russia  
8 even and having a more diplomatic approach,  
9 I also appreciated that.

10 It is all in an article I wrote in  
11 October of 2015, in Breitbart, where I list  
12 out -- I think it is literally called, The  
13 "20 Reasons Why It Should Be Donald Trump In  
14 2016."

15 And there I lay out everything I  
16 agreed with policy wise. Even his  
17 personality, I thought was just the right  
18 fit and kind of endearing. It was just kind  
19 of hard to find. Also I am not a big social  
20 conservative. I am very pro gay marriage,  
21 and I am not big on other so-called social  
22 issues that other Republicans are. And  
23 Mr. Trump was kind of the same way. He was  
24 kind of like a New York Republican. So it  
25 was kind of the -- he has arrived finally,

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A. DELGADO

the person who checks off all the boxes that were mine that were kind of unique. So I really just truly believed in his candidacy.

Q. In paragraph 17 it says, "In October of 2015 at a time when nearly all known conservative writers and pundits were supporting other candidates, Ms. Delgado wrote a viral article at this time in Breitbart entitled "20 Reasons Why It Should Be Donald Trump In 2016," at great profession and personal risk.

I believe that was the article you were referring to before.

Why did you consider it professionally risky for you to write this article?

A. Well, I think any observer of politics or media at the time could tell you every conservative with the exception of Jeffrey lord, who was an older man who I think was a writer at the time, I forgot of what publication, every other conservative, pundit or editor at any major conservative magazine or publication was either for Rubio

## 1 A. DELGADO

2 or Jeb or Ted Cruz. If you were for Trump,  
3 you were a periya and a crazy person who  
4 needed to have their career ruined. That  
5 was the landscape.

6 So to come out and publicly say in  
7 an article, and say I am a Trump person, was  
8 basically almost career suicide in media or  
9 politics.

10 As far as in the legal world,  
11 because of Mr. Trump's statements, including  
12 the statement he made about individuals who  
13 crossed the border, which I personally, I  
14 knew what he meant, and it was not artfully  
15 conveyed. But many people took that in a  
16 way that meant he was attacking those who  
17 come through our southern border.

18 And so me as an attorney to  
19 publicly align myself with a man who was  
20 already considered so toxic was a massive  
21 irreversible leap of faith.

22 And I did it because I believed in  
23 him. But I knew he would win, and I knew it  
24 was a gamble that would prove to be a wise  
25 one.

1 A. DELGADO

2 Q. Did you receive any backlash for  
3 this article in Breitbart?

4 A. A great deal of backlash, backlash  
5 is an understatement. I had someone spit on  
6 me at an event here in Miami, because here  
7 in Miami everyone he was pro Marco Rubio,  
8 some Jeb people, but a lot of Rubio people.  
9 Constant threats, even I received death  
10 threats. Twitter every day was just  
11 hellish, because I was on there every day  
12 pushing back, pushing back, e-mailing Steve  
13 Bannon, who was not a Trump fan originally,  
14 trying to convince Steve, get on the Trump  
15 cruise, get on the Trump train. It was  
16 exhausting, and it was just emotionally  
17 incredibly difficult, mentally incredibly  
18 difficult. But I believed in him and I  
19 wanted to support him.

20 Q. Is Breitbart a conservative news  
21 organization?

22 A. I would say so.

23 Q. Prior to October 15, had you  
24 written any other pieces in those  
25 publications you referenced earlier that

1 A. DELGADO

2 were deemed controversial?

3 A. No. If anything, I think I wrote  
4 pieces that were considered really kind of  
5 pushing the envelope, but proved to be  
6 insightful. For example, I wrote one about  
7 how it is time for the conservatives to stop  
8 defending the police. And I know some  
9 people considered that one controversial.  
10 But it was after Eric Garner rest in peace  
11 suffered what he suffered.

12 And I wrote another one about the  
13 problem with false rape accusations in  
14 National Review, after hearing about Brian  
15 Banks' story. Brian Banks was an  
16 African-American male whose life was ruined  
17 by a false rape accusation. So I wrote  
18 those two. But I would not say those were  
19 considered controversial. I think people  
20 just thought, oh, this is kind of like  
21 pushing the envelope a little and making a  
22 stink. In some ways some people, privately  
23 even conservatives saw these were things  
24 that need to be said. I would not say that  
25 they were controversial.

1 A. DELGADO

2 Q. Paragraph 18, it says, "Even  
3 before she, meaning you, was formally hired  
4 by the Campaign in August of 2016,  
5 Ms. Delgado made dozens of unpaid television  
6 and radio appearances supporting Donald  
7 Trump and the Campaign throughout the  
8 October '15 through August '16 period.  
9 Notably on November 4, '15, Ms. Delgado  
10 appeared on Sean Hannity's Fox News show and  
11 when asked to predict the election results  
12 correctly, predicted that Donald Trump would  
13 win the primaries and general election."

14 Prior to making these media  
15 appearances for Mr. Trump starting in '15,  
16 had you made any media appearances for any  
17 other politicians?

18 A. On behalf of any candidates in  
19 politics -- well, any time you go on TV and  
20 you advocate a position that a politician is  
21 advocating, you might qualify that as on  
22 behalf of a politician. Do you mean on  
23 behalf of a candidate?

24 Q. Fair enough. On behalf a  
25 candidate?

1 A. DELGADO

2 A. No, there was no candidate that I  
3 ever felt that strongly about to kind of  
4 make myself like a surrogate and then  
5 ultimately work for their campaign. I have  
6 never believed that much in any candidate.

7 Q. Prior to making these media  
8 appearances, have you made any media  
9 appearances for any public figures?

10 A. For a public figure, like as their  
11 employee or adviser?

12 Q. Just going on television, a piece  
13 on behalf of somebody that was popular in  
14 the news, whether on the Sean Hannity show  
15 or otherwise?

16 A. Sorry, I am not understanding your  
17 question, I am sorry.

18 Q. I can rephrase.

19 You acknowledged that Donald Trump  
20 was one of the first and only individuals  
21 that you went on the media and you supported  
22 as a candidate.

23 I am asking whether you ever did  
24 anything similar for any other public  
25 figures, so to speak, not necessarily

1 A. DELGADO

2 related to politics?

3 A. Yes, I am going to have to revert  
4 back to the earlier answer, that that is  
5 hard to extrapolate and separate and kind of  
6 tease out. When are you actually doing a  
7 public appearance on behalf of a public  
8 figure, if you are kind of defending what  
9 they said. You sort of always are. Because  
10 that's why it is in the news, because so and  
11 so said this. So I guess you are indirectly  
12 making an appearance that helps them or on  
13 their behalf, if you agree with them.

14 Q. Prior to making these appearances  
15 for Mr. Trump in 2015, did you have any  
16 experience in television?

17 A. Yes.

18 Q. Please describe that experience in  
19 television, when was the first time that you  
20 were on television?

21 A. I think it was 2013 on Sean  
22 Hannity's show. And on Yahoo, Yahoo had  
23 like a video politics thing, ABC News.  
24 Where else?

25 I think I had been on CNN once.



1 A. DELGADO

2 If you do a search, they could probably all  
3 come up. I think there is some sort of  
4 LexisNexis feature you could do.

5 Q. How did your first media  
6 appearance for Sean Hannity come to pass?

7 A. How did my first appearance for  
8 Sean Hannity come to pass?

9 Q. Yes.

10 A. I wrote an article. He was like a  
11 fan of the articles I would write. And then  
12 at one point he sent me an e-mail or DM.  
13 time for you to come on already. And that's  
14 when I started going on. He was a fan of my  
15 work.

16 Q. When did you first become  
17 interested in actually working for the  
18 Campaign?

19 A. It is hard to say, because I was  
20 like a volunteer surrogate for a while. I  
21 know Hope was kind of after me for a while,  
22 like hey, you could come on formally. That  
23 took a while for me to think about.

24 Q. Who was after you?

25 A. Hope, she would send me messages

1 A. DELGADO

2 or call me and say Mr. Trump saw your  
3 appearance last night on MSNBC or whatever  
4 and he loved it, when are you going to join  
5 us, that type of thing.

6 Q. You are referring to hope Hicks?

7 A. Yes, sorry, Hope Hicks.

8 Q. As for the reason why you wanted  
9 to work for the Campaign specifically, is  
10 that because of your belief in the  
11 candidate?

12 A. Yes. But also I think it is the  
13 belief in the candidate being able to win.  
14 And then all that comes with -- I am a  
15 political junky. What is greater than  
16 working in the White House? The candidate  
17 and when he wins, what comes after that. It  
18 is getting to serve your country, working in  
19 the White House, helping to run the country,  
20 the world, it is such a huge honor.

21 Q. Did any of your friends or family  
22 work for the Campaign?

23 A. No, no.

24 Q. Did you ever contact anyone to  
25 inquire about potentially working for the

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A. DELGADO

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Campaign?

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A. No. They were the ones asking me.

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Q. You referred to before Hope Hicks, did any other individuals on the Campaign reach out to you?

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A. Probably. I am sure they did. I remember there was like a lot of, I was kind of getting -- sorry, I get tongue tied, I am trying to think, I think Steve at one point, once he has decided to, was also pushing me to come in. Yes, there were others, I am sorry, I can't recall exactly who.

14

15

Q. When you refer to Steve, are you referring to Steve Bannon?

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A. Yes, at some point he like dropped the Cruz thing and then he was pro Trump.

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Q. Do you remember whether Hope worked for the Campaign before you worked for the Campaign?

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A. Yes, I think at some point she was working for Ivanka's clothing line, at some point early on in the Campaign. That was probably really early, like late 2015, I think.

1 A. DELGADO

2 Q. Do you know whether Steve Bannon  
3 worked for the Campaign before you?

4 A. I am sorry, before what? You cut  
5 off.

6 Q. Before you.

7 A. I think it was around the same  
8 time that we joined. But it is hard to  
9 tell, because Steve kind of doesn't announce  
10 things at times. So I can't, I would be  
11 speculating to say.

12 Q. Did you ever apply for a position  
13 with the Campaign, formally or informally?

14 A. You didn't apply, nobody like  
15 applied, at least not to my knowledge. Not  
16 at my level, not like adviser level. Maybe  
17 you applied like to work in the data group  
18 or something more operational. At the level  
19 like you are going to be defending him  
20 nationally on TV, you do not apply, it is  
21 more like they ask you.

22 Q. Do you recall any interview with  
23 the Campaign?

24 A. You also don't interview. Your  
25 audition is what Trump has seen of you. And

1 A. DELGADO

2 Trump also met me in person in August in  
3 Austin, Fox News had flown me out for a Town  
4 Hall that they were doing with me, they  
5 wanted me on stage with Sean. And so I met  
6 Trump in person then. And that was I think  
7 like a few days or two weeks before I  
8 officially joined.

9 Q. Did Mr. Trump tell you to join the  
10 Campaign or anything similar?

11 A. Oh, more so. He was like. Why  
12 you have been keeping me waiting? He was  
13 very, very -- I was taken aback by how  
14 complimentary he was. He said, this I will  
15 always remember, he said I will always be  
16 grateful, and I will never disappoint you.

17 Q. What position were you seeking or  
18 were you sought after for the Campaign?

19 A. Can I have a minute?

20 MR. BLUMETTI: We could go off the  
21 record. We will take five minutes.

22 THE WITNESS: We could keep going,  
23 I will get myself together, go ahead,  
24 you were saying about the position.

25 Q. Correct, I understand that people

1 A. DELGADO

2 were reaching out to you to ask whether you  
3 wanted to come.

4 Did you have an idea of what  
5 specific position?

6 A. Yes, so there was a scarcity, they  
7 needed people, especially women, who were  
8 good on TV and understood his message. And  
9 especially a bonus, a woman who is Hispanic  
10 and can speak to those issues authentically.  
11 So it was very clear it would be for a  
12 position where it is a national adviser  
13 level, like a spokesperson type.

14 Q. When did you learn that you had  
15 been hired to work for the Campaign?

16 A. It was not even so much as a  
17 particular date. It was just okay, you are  
18 ready to come on. I guess that was like  
19 August.

20 Q. Who told you that?

21 A. I would be speculating.

22 Q. Do you know who made the ultimate  
23 decision for you to come on board?

24 A. I am guessing it was a group  
25 decision, so I would be speculating.

1 A. DELGADO

2 Q. I don't want you to speculate, but  
3 do you have any idea of who would have  
4 comprised that group?

5 A. Deciding who came on board, well,  
6 I suppose -- no, I mean, I am speculating,  
7 sorry.

8 It is the Comms Group, so I guess  
9 people who are high level, but I would be  
10 high level. At that level, it would be hard  
11 to say who is the person saying okay, hire  
12 her. I know Jason Miller was involved, but  
13 I don't know who else.

14 MR. BLUMETTI: I am going to show  
15 you this three-page document. Let's  
16 mark it for identification as  
17 Defendant's K.

18 (Whereupon, a three-page document  
19 P 451 to 453 was marked Defendant's  
20 Exhibit K for identification as of this  
21 date by the reporter.)

22 Q. It is Bates stamped P451 to P453.  
23 Do you recognize this document?

24 A. I am not trying to be cute, but  
25 the same thing as always, it appears to be,

1 A. DELGADO

2 it appears to be. I trust you are giving me  
3 an accurate copy, the agreement that I had  
4 with the Campaign.

5 Q. I am going to represent to you  
6 that the P in the Bates stamp, this was  
7 produced from you to us?

8 A. There you go, then it is, thank  
9 you.

10 Q. Directing your attention to the  
11 signature block, is that your signature?

12 A. Yes, that's my signature, yes.

13 Q. This address set forth below your  
14 signature, were you living at that address  
15 when you started working for the Campaign?

16 A. No, I don't know why the e  
17 signature thing or when they sent it to me.  
18 That's the address of where I would receive  
19 mail. I think they had me put the mailing  
20 address. I had a P.O. Box where I would  
21 have sensitive mail sent, because I had  
22 issued with things, a perfect example being  
23 the notice Court sent notice of that TRO  
24 hearing that I never received and didn't  
25 appear at the hearing, I used to have



1 A. DELGADO

2 sensitive mail go to a UPS store at 18 and  
3 Ponce, that's that.

4 Q. I am directing your attention to  
5 the exhibit. Does Exhibit A fairly  
6 characterize the type of work that you  
7 agreed to perform on behalf of the Campaign?

8 A. Hold on, I am trying to minimize  
9 the pictures here, so I could read past the  
10 tab on the side.

11 Q. Does that help?

12 A. Yes, thank you.

13 Yes, that seems to be generally  
14 correct, yes.

15 Q. During the time period that you  
16 worked for the Campaign, so let's say  
17 roughly from August '16, the election, did  
18 you physically work out of Florida?

19 A. No, most of it was out of New  
20 York. It was a hybrid. Everybody was  
21 traveling, nobody was fully based inside New  
22 York all the time. But it was certainly  
23 based out of New York, that's where our  
24 headquarters were.

25 Q. So focusing on that three to

1 A. DELGADO

2 four-month time frame for now, approximately  
3 how many days a week did you physically work  
4 out of New York between August and November  
5 of '16?

6 A. Oh, I couldn't tell you. I would  
7 be speculating.

8 Q. Do you know if it was more than  
9 one?

10 A. More than one day a week?

11 Q. Yes.

12 A. Is this on average? Because some  
13 weeks it would be like a full week. And  
14 then -- yes, I am sure, it was more than  
15 one. I am sure it was more than one day a  
16 week.

17 Q. Did you physically work out of  
18 Florida during that time frame?

19 A. When you say physically work?

20 Q. Well, it gets a little nebulous,  
21 where your boots were on the ground in a  
22 particular state?

23 A. Well, everybody had boots on the  
24 ground at different states at different  
25 days. I mean, it is a national campaign.

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A. DELGADO

So if we are all in New York the whole time, none of us are doing our jobs.

Q. How many total states would you say that you worked out of during that three-month time period?

A. We traveled so much, I would be speculating. Maybe like over five, for sure. Those were visits with Campaign people out of New York and going back to New York. So it is kind of flying somewhere for a meeting, I don't know if that would be considered boots on the ground working in another state.

Q. When you physically worked out of New York, where were you working out of, were you at an office?

A. We were in Trump Tower, the Campaign headquarters. Even when we were elsewhere, we were always working out of Trump Tower. We were just visiting somewhere else. But base camp was always Trump Tower. Coordination, instructions, directives were all from Trump Tower. Our stuff was always back at Trump Tower.

1 A. DELGADO

2 But since it is a Campaign, we  
3 were constantly flying, yes, I suppose,  
4 someone.

5 Q. As you said before, whether you  
6 were physically inside Trump Tower ranged  
7 from one day a week some weeks to it could  
8 be a full week other weeks?

9 A. I didn't say it was one day a  
10 week. I said it was more than one day a  
11 week, but that I don't know and I couldn't  
12 tell you. It is six years ago.

13 I know I was there very often,  
14 because I became good friends and have a lot  
15 of distinct memories of Trump Tower. We  
16 were there very often.

17 Q. Where were you staying in New York  
18 at that time?

19 A. Oh, the Campaign would put you up  
20 in hotels or in apartments or a combination  
21 of both.

22 Q. Did you stay in hotels, apartments  
23 or did you stay in one of the other?

24 A. Both. At some point I had hotels  
25 arranged for me. And then at some point I

1 A. DELGADO

2 had apartments arranged.

3 Q. More than one apartment as well?

4 A. I don't remember if they had me  
5 switch apartments. I know I was in one for  
6 a while.

7 Q. Do you recall what neighborhood  
8 that apartment was in?

9 A. On the East Side of Manhattan, I  
10 think it was. I remember what it looked  
11 like inside. I don't remember the address.

12 Q. What about the hotels, do you  
13 recall any particular hotels that you stayed  
14 at?

15 A. No. But that is probably in like  
16 HR's e-mails on your end. I guess you guys  
17 could have that. I can't recall -- I am  
18 sorry, I have a terrible memory. Hotels  
19 don't stick in my mind. Hotels are a blur  
20 to me, I am sorry.

21 Q. At any time prior to signing this  
22 consulting agreement, did you inform the  
23 Campaign about the injunction that was  
24 obtained against you?

25 A. I know Miller knew, but I can't

1 A. DELGADO

2 recall when I told him.

3 Q. So aside from Jason Miller, do you  
4 recall yourself telling anybody about this  
5 injunction?

6 A. Let me think, did I? I don't  
7 think I would have mentioned it to somebody  
8 else, because there was no obligation to  
9 mention it.

10 Q. I am just asking yes or no whether  
11 you did?

12 A. I don't think I would have because  
13 there was not an obligation to. And  
14 certainly in hindsight it didn't seem there  
15 was, given that Rob Porter worked in the  
16 White House and had one for battery, so. I  
17 stand by not mentioning it. It certainly  
18 didn't seem to matter for others.

19 Q. Did any workers on the campaign  
20 aside from Jason Miller know about the  
21 injunction, to your knowledge?

22 A. No. But I don't think anybody  
23 would have -- I see no reason to mention it.  
24 We all knew Steve Bannon had a domestic  
25 violence battery injunction from the '90's,

1 A. DELGADO

2 that came out in the press and no one batted  
3 an eyelash, certainly not Mr. Trump or  
4 anyone.

5 Q. I am not comparing. I am just  
6 asking you whether you know if anyone knew?

7 A. I would be speculating, I don't  
8 know what someone knew. I think they would  
9 know, because I would think they would do a  
10 background check. If it is that important,  
11 they would have done a background check. If  
12 they didn't do a background check, it is  
13 because it is not that important.

14 MR. BLUMETTI: I am just going to  
15 move to strike the part that is  
16 unresponsive.

17 Q. Similar question, Ms. Delgado, did  
18 you inform anyone at the Campaign regarding  
19 travel restrictions that were imposed on you  
20 by the Florida Court?

21 A. I don't think so, because there is  
22 no obligation in the restriction that I  
23 inform. And again, my presumption is that  
24 they would research these things themselves,  
25 a background report is pretty standard, a

1 A. DELGADO

2 background search.

3 Q. Did you tell Jason Miller about  
4 the travel restrictions?

5 A. I would be speculating. That's a  
6 conversation from six years ago.

7 Q. I don't want respect you to  
8 speculate, so you don't know whether you did  
9 or not?

10 A. No.

11 Q. Do you recall your first day  
12 working on the Campaign, when that was?

13 A. I think it was either like  
14 August 30 or September 1, something like  
15 that, definitely no later than September 1  
16 of 2016.

17 Q. And on September 1 of 2016, where  
18 were you physically?

19 A. I think in New York.

20 Q. Were you assigned to a specific  
21 team or department?

22 A. The Comms Group is where the  
23 advisers were, my counterparts were Boris,  
24 Sarah and Omarosa, all four of us did the  
25 same thing. Granted with some like



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A. DELGADO

2

offshoots. Like Sarah would focus on the  
3 Evangelical, I would focus a little bit on  
4 Hispanic, Omarosa would focus on outreach to  
5 other groups. And I forgot what Boris' was.  
6 But in the Venn diagram, we were all in the  
7 same section of the four folks that go out  
8 and do the national hits.

9

Q. Do you know who, if anyone,  
10 assigned you to that particular department?

11

A. That was always the roll offer,  
12 whoever put together that sheet.

13

Q. It was understood that that's what  
14 you would be doing?

15

A. Yes, what I said earlier, the  
16 national media.

17

Q. How many total people worked in  
18 the Comms Department, not necessarily on  
19 national media?

20

A. I would be speculating, definitely  
21 over a dozen.

22

Q. Who was the head of the Comms  
23 Department?

24

A. Jason Miller.

25

Q. Did anyone report to you?

1 A. DELGADO

2 A. Yes, although I am a big personal  
3 believer in not enforcing hierarchical  
4 structure underneath me. I think I am the  
5 opposite of that, I am too humble of a  
6 person for that. Although surrogates who  
7 did media hits would probably be considered  
8 to be reporting to me, I am not sure  
9 formally I would look at it that way. But  
10 yes, technically, yes.

11 Q. Do you recall the names of any  
12 particular individuals who were technically  
13 supposed to report to you?

14 A. When you say technically, that's  
15 what I mean, there is no technical formal.  
16 The Campaign was not so rigid I think on  
17 that front.

18 Q. Please describe what you did on a  
19 day-to-day basis when you started working  
20 for the Campaign?

21 A. Help with talking points, do media  
22 hits, a lot of hits, prepare for the media  
23 hits, keep an eye out on what the opposition  
24 was doing, saying, preempting what our given  
25 to the opposition might make and preempting

1 A. DELGADO

2 what Mr. Trump's remarks to counter that  
3 might be, searching out weaknesses in  
4 advance, doing cleanup. I hate to use that  
5 term, but cleanup constantly for some of  
6 what Mr. Trump would say, doing cleanup for  
7 some of what our own advisers would go on TV  
8 and say, and some of the rest of us would  
9 have to clean that up.

10 Working on relationships with  
11 reporters, you want to keep a good  
12 relationship with them. And on our  
13 relationship with hosts, keeping them in the  
14 mix. Doing the Hispanic outreach, of  
15 course, I tried to fit in as much Spanish  
16 media as I could, also balancing my  
17 obligations on the national media front. I  
18 would do shows like Fox News. But then I  
19 would also do as much as I could in Spanish  
20 language, Univision, Telemundo. It was  
21 important for me to reach out to the Spanish  
22 community as well. I think that's a general  
23 bullet point. I am probably missing a  
24 couple of things.

25 Q. Did you work mostly on the

1 A. DELGADO

2 computer, on the phone, in the field, how  
3 would you characterize it?

4 A. All of the above.

5 Q. Did your day to day remain  
6 relatively consistent up to the election?

7 A. No, a Campaign is never consistent  
8 day to day.

9 Q. Your overall work duties and  
10 responsibilities, did those remain  
11 relatively consistent?

12 A. No, because even though the  
13 overarching duty is the same, what falls  
14 underneath, though, is constantly changing.

15 Q. How would you describe the  
16 difference between what you did on the day  
17 to day let's say in September of '16 versus  
18 October of '16?

19 A. Some days you might need more  
20 clean up. There were weeks where Trump  
21 would say more things that were  
22 controversial, that it was more of a clean  
23 up focus. Sometimes if Trump had made a  
24 comment that had been taken poorly by a  
25 particular community, for instance, the

1 A. DELGADO

2 Latino community, then that was a week where  
3 I would be focusing more on going to  
4 Univision, talking to Inosca (phonetic),  
5 Shava Martina (phonetic), making sure she  
6 gets her interview. So it depended on -- it  
7 was topped down very much in a way, what is  
8 Mr. Trump doing, what is Mr. Trump saying,  
9 what is Hilary doing, what is she saying.  
10 Based on that we had to constantly adjust.

11 Q. Did you work by yourself on in a  
12 team setting?

13 A. A Campaign is always a team.

14 Q. You referred to your counterparts  
15 as Sarah Sanders, Boris Epshteyn and Omarosa  
16 Manigault, is that what you considered to be  
17 your team?

18 A. I am sorry, on an organizational  
19 chart the four of us would have been the  
20 same, if that makes sense. When I say my  
21 team and we all worked at Comms. So yes,  
22 even not only on the horizontal line of the  
23 work chart, but even the grouping we fell  
24 into, it was Comms, we were all Comms  
25 people, Comms and policy.

1 A. DELGADO

2 Q. Who was directly above for you on  
3 the chart?

4 A. Jason Miller would be directly  
5 above.

6 Q. Anybody above Jason in Comms?

7 A. No.

8 Q. Who did Jason report to?

9 A. I think he theoretically would  
10 have reported to the Campaign manager. But  
11 I think he just reported to Trump.

12 Q. Did your team, as we just  
13 described it, remain relatively consistent  
14 up until the election?

15 A. Yes.

16 Q. Did you and your counterparts  
17 continue to report to Jason essentially  
18 until the election?

19 A. Yes.

20 Q. Did you personally report to any  
21 other individuals on a day-to-day basis?

22 A. Never. There was no one else  
23 above me. And I would have not stood, I  
24 would not have taken the role if I were not  
25 in a senior position.

1

A. DELGADO

2

MR. BLUMETTI: I want to take a  
three-minute bathroom break.

4

THE VIDEOGRAPHER: We are off the  
record. The time is 11:47 a.m. eastern  
time.

7

(Whereupon, a short recess was  
taken.)

9

10

THE VIDEOGRAPHER: We are back on  
the record. The time is 11:55 a.m.  
eastern time.

11

12

Q. Are you familiar with an  
individual named Jessica Denson?

13

14

A. Yes, I remember her.

15

16

Q. Did Jessica work with you on the  
Campaign?

17

18

A. Not with me, she worked at the  
Campaign.

19

20

Q. Have you ever met Jessica in  
person?

21

A. Yes.

22

23

Q. Do you know approximately how many  
times?

24

A. A handful.

25

Q. Less than ten?

1 A. DELGADO

2 A. Yes.

3 Q. Did you report to Jessica?

4 A. No.

5 Q. Did Jessica report to you?

6 A. No. I have no idea what her role  
7 was.

8 Q. How would you characterize your  
9 interactions with Jessica?

10 A. I remember she was limited, she  
11 was in data, she was in the data department.  
12 And she tried moving into a half like  
13 Hispanic outreach, that's all I recall. No  
14 one was quite clear what that was about, it  
15 was odd, an odd person.

16 Q. Did you ever mistreat Jessica?

17 A. No, absolutely not, no.

18 Q. Did you ever try to sabotage  
19 Jessica at work?

20 A. No, absolutely not.

21 Q. Are you aware, Ms. Delgado, that  
22 Jessica Denson has made allegations against  
23 you in connection with a lawsuit that she  
24 filed against the Campaign?

25 A. I believe I read in the Daily Mail



1 A. DELGADO

2 a year or so ago that she had made  
3 allegations about her supervisor in the data  
4 department, who I was friendly with. And I  
5 think then my name was mentioned in  
6 connection with that.

7 Q. Do you know who the individual in  
8 the data department was?

9 A. What was his name, Camilo, I  
10 think, Camilo.

11 Q. When did you first become aware  
12 that Jessica had made allegations against  
13 you?

14 A. Oh, I don't recall.

15 Q. Have you ever read any of the  
16 pleadings that Jessica filed in her lawsuit  
17 against the Campaign?

18 A. No, I read a Daily Mail article  
19 briefly, I don't think it had the pleadings.

20 MR. BLUMETTI: I am going to share  
21 my screen with everybody. And we are  
22 going to mark this Defendant's L.

23 (Whereupon, an Amended Complaint  
24 was marked Defendant's Exhibit L for  
25 identification as of this date by the

1 A. DELGADO

2 reporter.)

3 Q. This is a 16-page document marked  
4 for identification as Defendant's Exhibit L.  
5 It is not Bates stamped. It is a publicly  
6 filed copy in the State of New York. It  
7 purports to be a copy of the amended  
8 complaint filed by Jessica Denson against  
9 Donald J. Trump for President, Inc. in the  
10 year of 2017.

11 Have you ever read this document?

12 A. I don't believe I have.

13 Q. On page 7, paragraphs 18 and 19,  
14 it says, "Between September 8 and 26 of  
15 2016, Denson launched the Campaign's  
16 Hispanic engagement effort."

17 Do you dispute that allegation?

18 A. Yes, I remember, this is jogging  
19 my memory. This is the young woman who a  
20 lot of us felt, God bless her, was mentally  
21 unwell. She was a data entry person in the  
22 data department. And then she started to  
23 claim that she was the head of a National  
24 Campaign Hispanic outreach. That refreshes  
25 my memory now. I wish her well. She is

1 A. DELGADO

2 unwell. It is sad.

3 Q. This paragraph 18 where she  
4 references you, it says, "Denson became  
5 acquainted with and began to work  
6 collaboratively with Arlene, A.J. Delgado, a  
7 more recently hired Campaign surrogate and  
8 senior adviser. During this time and since  
9 her hiring, Denson enjoyed growing mutual  
10 respect among her colleagues in Trump Tower  
11 and exceptionally positive feedback from the  
12 field."

13 And then it says in 19, "During  
14 the week of September 26, 2016, Delgado  
15 displayed a sudden shift in behavior and  
16 subsequently reserved the plaintiff's  
17 position in the Campaign henceforth calling  
18 herself "Hispanic outreach director."

19 Do you dispute this allegation,  
20 Ms. Delgado?

21 A. Yes, as written. I mean, you saw  
22 in my earlier consulting agreement that was  
23 part of my job. I don't want to speak ill  
24 of someone, because as you know from my work  
25 as the general counsel of ALPFA, one of my

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A. DELGADO

passions in life is elevating the Latinos.  
And I recall Jessica at least said she was a  
Latino, I assume she was not lying about  
that. So this is somebody I would have  
helped, and this is just very awkward and  
sad.

Q. I am not asking you to maline by  
any means, I am just asking if these  
allegations were true. Paragraph 20, on  
October 1, 2016, "Upon arrival to Colorado  
for Campaign travel, the plaintiff was  
urgently alerted by two data staffers, one  
of whom witnessed a phone call placed on  
speaker by Sandoval in the Campaign's data  
office that an aggressive conspiracy was  
underway between Sandoval and Delgado to  
sabotage her personally and professionally  
including tracking Denson's whereabouts,  
trying to find dirt on her, getting Secret  
Service involved and finding a way to get  
her fired."

Do you dispute this allegation,  
Ms. Delgado?

A. Yes.

1 A. DELGADO

2 Q. On page 15, in paragraph 40,  
3 "Denson alleged, among other things, that  
4 there was a character assassination launched  
5 by Sandoval and Delgado falsely portraying  
6 the plaintiff as wasteful, distrustful and  
7 as a danger and threat in the eyes of these  
8 individuals and organizations."

9 Do you dispute this allegation?

10 A. Yes.

11 Q. You said before that you were  
12 friendly with Camilo, at least at that time?

13 A. Yes, well, he was one of the few,  
14 only other Latinos in the Campaign.

15 Q. How would you characterize  
16 Camilo's personality?

17 A. Very sharp, competent, friendly  
18 individual, nice guy.

19 Q. When was the last time you spoke  
20 to Camilo?

21 A. Years ago.

22 Q. Did Camilo ever make any insulting  
23 or derogatory comments to you?

24 A. No.

25 Q. Did you ever make any insulting or

1 A. DELGADO

2 derogatory comments to Camilo?

3 A. No.

4 Q. Did you ever make any insulting or  
5 derogatory comments to Jessica Denson?

6 A. No. I had very limited  
7 interaction with her.

8 (Whereupon, an e-mail Bates  
9 stamped DEF 16 and 17 was marked  
10 Defendant's Exhibit M for  
11 identification as of this date.)

12 MR. BLUMETTI: I am sharing my  
13 screen again. I am going to show you a  
14 document that I would like to mark has  
15 Defendant's Exhibit M. This was  
16 produced in this action Bates stamped  
17 DEF 16 and 17. It purports to be an  
18 e-mail that Jessica Baez Denson sent to  
19 Steve Bannon on September 29 of 2016  
20 regarding you.

21 Have you ever seen this e-mail  
22 before?

23 A. No, the first time.

24 Q. If you would not mind, if you  
25 could read the first few paragraphs and let

1 A. DELGADO

2 me know when you have had a chance to read  
3 it?

4 A. The first three?

5 Q. Yes, just to get a feel for it.

6 A. I am done.

7 Q. In the third paragraph Jessica  
8 wrote that you treated her, quote,  
9 disrespect flee in a manner detrimental to  
10 the Campaign. Are Jessica's words to this  
11 effect true?

12 A. No, as she is clearly upset as the  
13 first two paragraph make clear, Steve told  
14 her you report to A.J. I think she wanted  
15 my role even though she had no experience  
16 and had come out of data entry job in the  
17 data entry department. That's what is  
18 motivating this. It is sad to read.

19 Q. Did any other Campaign workers  
20 make any complaints regarding your behavior  
21 or conduct on the Campaign?

22 A. Not that I am aware of.

23 Q. You mentioned Hope Hicks before.

24 Did you ever have any issues with  
25 Hope at work?

1 A. DELGADO

2 A. Only a minor one near the end.  
3 Hope and I got along really well. But there  
4 was just a minor one near the end where she  
5 was upset that she was being blamed, and I  
6 thought it wasn't my fault, about a reporter  
7 who was supposed to interview Mr. Trump and  
8 then Hannity had told us, don't let that  
9 reporter interview Mr. Trump, it is an  
10 ambush. So we had a little bit of a -- you  
11 know, I would say a minor, maybe not --  
12 well, disagreement is the word, I suppose.

13 Q. Did there come a time when you  
14 were involved in a physical altercation with  
15 Hope?

16 A. God, no, no, never. I don't think  
17 I have ever been in a physical altercation  
18 with anyone as an adult, even as a teen,  
19 much less not at work and certainly not on  
20 the Trump Campaign, my God, no.

21 Q. Did there come a time when you  
22 were involved in a verbal altercation with  
23 Hope?

24 A. No, just the disagreement we had  
25 on the plane. She made some remark how the



1 A. DELGADO

2 accent between the reporter who is also  
3 Cuban from Miami and I was similar. And  
4 that was something that I don't know if she  
5 picked that up from Boris Epshteyn, because  
6 Boris Epshteyn used to make fun of my accent  
7 in the war room and people found that funny.  
8 I have a Miami accent, a Miami-Latino  
9 accent. I think Trump overheard, and was  
10 like oh -- he called it a cat fight. But it  
11 wasn't really, that was like the end of it.  
12 But it did really hurt me that she had made  
13 the comment about my accent.

14 Q. What did you say to her?

15 A. I don't think I said anything, I  
16 don't think I said anything back. I think I  
17 probably just rolled my eyes.

18 Q. Did you curse at her?

19 A. No, never, never in the workplace,  
20 never.

21 Q. Who else was present during this  
22 situation?

23 A. I think Steven Miller. He was  
24 sitting there, doing his speech writing on  
25 his laptop, and Trump.

1 A. DELGADO

2 Q. Did anybody aside from Mr. Trump  
3 make any comments?

4 A. Yes. The stewardess was also  
5 present, a blonde lady with her hair like in  
6 a bun. And I didn't get off, because I was  
7 nauseated. We were headed to a rally. And  
8 a stewardess came up to me and said  
9 privately, because I was the only one on the  
10 plane that stayed behind, she said that's  
11 not the first time I have seen Hope act that  
12 way with other women.

13 Q. When you say act that way, what  
14 did she mean by that in your mind?

15 A. My understanding was like in a  
16 catty fashion.

17 I think Hope probably had a little  
18 bit of an issue, because I had seen her and  
19 Corey together. And I don't know if she was  
20 worried that I might somehow, some day say  
21 something. She acted strangely since that  
22 day since I saw them physically together.

23 Q. Aside from the two disagreements  
24 that you just referred, any other  
25 altercations with Hope?

1 A. DELGADO

2 A. No, we got along great, usually.  
3 And even after that, I think when she broke  
4 up with Rob Porter, the one who had the  
5 restraining order for battery on his ex-wife  
6 but somehow got into the White House anyway,  
7 I sent her a text even like, hey, you know,  
8 I know love is complicated, you are a great  
9 girl, hang in there. Sometimes at work you  
10 have a little minor flair up for ten minutes  
11 and it goes away.

12 Q. Who is Bryan Lanza?

13 A. Bryan I think was a guy who was in  
14 charge of the surrogates, like the volunteer  
15 people who are not with the Campaign, but  
16 they go on TV, that's called the surrogate,  
17 and he was in charge of those folks.

18 Q. How would you characterize your  
19 interactions with Bryan?

20 A. Cordial, very just -- I don't have  
21 any observation on that. Just very limited  
22 interaction, because I didn't work for him  
23 and he didn't work for me and limited,  
24 cordial, polite.

25 Q. Did Bryan ever make any complaints

1 A. DELGADO

2 regarding your behavior on the Campaign?

3 A. No, to answer your question, no,  
4 not that I know of. I know one time he was  
5 upset that he was sitting at my desk in the  
6 war room, and Jason told him to leave my  
7 desk. And then John told me that he went to  
8 Jason like, why did you tell me to get out  
9 of her desk, Jason was like because it is  
10 her desk.

11 He used to joke about how machista  
12 he was. Like one time he said his wife had  
13 complained to him about something, and he  
14 said well, I am a strong Latino male, which  
15 is not what we stand for in the Latino  
16 community. And I think he was bothered that  
17 he was asked by Jason to move out of my  
18 seat. I don't know if that counts as a  
19 complaint, but I wanted to give you an  
20 honest answer.

21 Q. Do you recall when that seat  
22 incident happened?

23 A. It was so minor, I don't recall  
24 the date. Maybe like October, November,  
25 December.

1 A. DELGADO

2 MR. BLUMETTI: I am going to show  
3 you an e-mail to mark as Defendant's  
4 Exhibit N.

5 (Whereupon, an e-mail Bates  
6 stamped DEF 621 was marked Defendant's  
7 Exhibit N for identification as of this  
8 date by the reporter.)

9 Q. Do you see this?

10 A. Wow, so he really does not like  
11 women. Don't worry, I am not going to blow  
12 her up, wow, this is helpful.

13 Q. Defendant's Exhibit N, Bates  
14 stamped 621, purports to be a an e-mail that  
15 Bryan sent to Jason on November 6 of 16, in  
16 the bottom one it says, "Hey, man, I get  
17 that A.J. is crazy, but I am not involved in  
18 anything related to credentials."

19 Do you know what he would be  
20 referring to here?

21 A. I have no idea. Just to be clear  
22 for the record, this is two e-mails that he  
23 sent to Jay Conright, one right after the  
24 other.

25 Q. Right, the Boris Epshteyn, the top

1 A. DELGADO

2 one I was speaking about first?

3 A. Okay.

4 Wow, this person was allowed to  
5 work in the White House after referring to a  
6 female colleague as crazy, wow.

7 What is your question about it?

8 Q. I am just asking you whether you  
9 do know what he was talking about here, why  
10 he would refer to you as crazy?

11 A. Because in line with what I  
12 observed of him and the kind of comments he  
13 makes, that's how he would refer to very  
14 much to a woman who is doing great work and  
15 who Trump loves. He also used to make fun  
16 of women on TV, in particular a CNN anchor  
17 in her 30s. Everybody thought it was very  
18 funny when he said, she used to be hot when  
19 she was young, and everybody laughed.  
20 That's the kind of person Bryan is. So I  
21 don't know what he is referring to.

22 Maybe like a surrogate who needed  
23 credentials is what I could speculate to, I  
24 don't know.

25 Q. Did you engage in any conduct

1 A. DELGADO

2 during your time working for the Campaign,  
3 that would be characterized as, quote,  
4 crazy?

5 A. No, absolutely not.

6 Q. In the top e-mail that you  
7 referred to, Bryan follows this up and says,  
8 "I don't give a shit what she writes or  
9 thinks about me. She is driving Chris crazy  
10 and getting everyone riled up."

11 Do you know who Chris is?

12 A. No idea.

13 Bryan was having an affair with  
14 Kelly Lug, by the way, so maybe that is why  
15 he had an issue with me because I had seen  
16 them together also.

17 Q. Bryan Lanza was having an affair  
18 with who?

19 A. Kelly Lug. She was a blonde,  
20 bubbly, young girl, kind of like a junior  
21 staffer. So I don't know if that was part  
22 of his -- Bryan was in the same apartment  
23 building as Jason. So we saw them together,  
24 kind of making out her hair a mess in the  
25 morning in his doorway. I don't know if

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A. DELGADO

that's kind of what prompted -- I just gave him a look like, wow, I don't know if that's what prompted his anger towards me, possibly.

Q. You indicated that Kelly worked for the Campaign as well?

A. She did.

Q. When did you first meet Jason Miller?

A. At the RNC in Cleveland in the summer of 2016.

Q. Was that before or after you signed that consulting agreement which was the benchmark of like September 1 of '16?

A. Before.

Q. A few weeks before?

A. Like several weeks.

Q. Did someone introduce you to him?

A. No, he came up to me.

Q. Did he know who you were?

A. Yes.

Q. Did he know who you were from having seen you on television?

A. Yes, he said he considered me one



1 A. DELGADO

2 of Trump's best, having observed from the  
3 other side, since he was a Cruz supporter up  
4 until recently.

5 Q. Did Jason work for the Campaign at  
6 this point?

7 A. Yes, he had already been hired.

8 Q. Do you recall when Jason started  
9 working for the Campaign?

10 A. Early summer of 2016. They  
11 announced it, so you would know better than  
12 I if you Googled it.

13 Q. Do you know what Jason was doing  
14 before he started working for the Campaign  
15 in the summer of '16?

16 A. He was the Comms director for Ted  
17 Cruz, the Ted Cruz Campaign, I am sorry.

18 Q. In the Jessica Denson complaint  
19 and e-mails, we saw some disagreement with  
20 Hispanic engagement director, was that your  
21 title or not?

22 A. At some point Steve, I think it  
23 was Steve, most likely I think it was Steve,  
24 who said you are in charge of this, now we  
25 need somebody to be like our Hispanic point

1 A. DELGADO

2 person, so that's your roster.

3 Q. Was that under the umbrella of  
4 your national media hit in the Communication  
5 Department job duties?

6 A. I would be speculating to say how  
7 it qualifies under the umbrella. I don't  
8 know how they see it or how I saw it.

9 Q. Let me ask you another way, the  
10 four people that you referred to as your  
11 level in the Comms Department, did you only  
12 handle Hispanic engagement or did you also  
13 handle other aspects?

14 A. Oh, it would be very easy to just  
15 do Hispanic engagement. I still had to do  
16 all the hard hits on National TV, Maddox,  
17 Chris Hailey, I was still doing the  
18 national. It was like double the workload,  
19 in other words.

20 Q. Did any Campaign workers other  
21 than Omarosa, Boris and Sarah have similar  
22 job responsibilities as you?

23 A. No. I would say those four had  
24 the unique.

25 Q. And all four of you reported to

1 A. DELGADO

2 Jason; is that correct?

3 A. That's how I saw it.

4 Q. Approximately how often did you  
5 report to Jason? Was it on a daily basis?

6 A. I would say so.

7 Q. Was that in person, by e-mail, by  
8 phone, something else?

9 A. All of the above, usually in  
10 person.

11 Q. Approximately how many days per  
12 week did you see Jason in person during your  
13 time from August 16 until let's say election  
14 night, November 8 of 16?

15 A. Close to 100, maybe.

16 Q. Did there come a time when you  
17 engaged in a sexual relationship with Jason?

18 A. Yes.

19 Q. During which period of time total  
20 were you engaged in a sexual relationship  
21 with Jason?

22 A. It began at the end of October to  
23 end of December or mid December.

24 Q. Was this a consensual  
25 relationship?

1 A. DELGADO

2 A. No, I would not qualify it as  
3 that.

4 Q. How would you qualify it?

5 A. It began with a sexual assault,  
6 and a situation where I had to go along,  
7 because otherwise you can't piss off  
8 somebody, especially in a Campaign that is  
9 so wild west-ish, you can't piss off the one  
10 person that can easily oust you.

11 Q. Where did that assault take place?

12 A. The night before the last debate  
13 between Hilary and Trump, we were all in Las  
14 Vegas, because that's where it took place.  
15 And it was a busy, busy, busy, hits, hits,  
16 hits, all day long. And then there was a  
17 big media party for all the advisers and  
18 everybody. And Jason was there, Sean was  
19 there, we were all there, the RNC people  
20 were there. And I hardly had anything to  
21 eat that day, I think I had like a lettuce  
22 wrap around noon. And Jason showed up at  
23 Tao. I remember I used to always call him  
24 boss, because he had kind of been making  
25 flirtatious remarks and looked at me funny

## A. DELGADO

every since he joined the Campaign, and I wanted to establish that. I would always call him boss. He asked me where are you guys, I said hey, boss, we are all at Tao, and he came over. And he just kept going to the bar to give me drinks, you can't not -- it is such a difficult situation to seem like a team player. And everybody was drinking and the reporters were drinking. And I kept on trying to slowly sip on my vodka. And they kept going after that, going after that. Then after that he wanted to go to another club, and that club was closed. And then there was a strip club was the only place that was serving alcohol. So he had us all go to a Strip club. It was like me, him, Jessica Ditto, his like lieutenant that he had brought over from another Campaign, and some reporters. And we went to a strip club. And he got me more drinks there, and I remember he asked me if I had any tattoos. And I said I didn't. He said you have such a nice body, it would be a shame to put tattoos on it. And it was

1 A. DELGADO

2 already feeling really weird. And then  
3 after that I was starting to feel ill. And  
4 I wanted to be alert, and I said let's go by  
5 Jack in the Box to eat something. And it  
6 was closed so the driver took us through the  
7 drive-through, nowhere was open to eat, just  
8 the drive-through. So Jason said, well,  
9 didn't you say you have a suite? Let's go  
10 -- and I did have a suite with a living  
11 room, and Jessica was with him, there was  
12 another girl with him. So I said come back  
13 -- I am sorry. We went back. And right  
14 after we were in the living room eating and  
15 we were watching, he told Jessica to leave.  
16 And she immediately got up and left. And I  
17 took the orders instantly. And what I  
18 remembered after that was waking up and I  
19 had this like halter jump suit from BB, this  
20 store. And I woke up and it was still like  
21 wrapped around my ankle with one of my heels  
22 on, and I could tell he had -- that was how  
23 it started. That's how it started. And I  
24 just tried to -- how do I spin this, how can  
25 I play along until the Campaign is over

1 A. DELGADO

2 without pissing him off?

3 That was --

4 Q. Did you tell any Campaign workers  
5 about what happened in Las Vegas prior to  
6 the election?

7 A. What would that have done?

8 Q. I am asking you that, I am asking  
9 whether you told?

10 A. No, I didn't, because my thought  
11 process is what would that do. I am  
12 ostracized from politics forever, I had  
13 written an article a few years earlier about  
14 false rape accusations. What was going to  
15 do? Okay, you are out of the Campaign, go  
16 file your police report, that's it. What  
17 did I gain from that?

18 Q. Did you ever make any comments or  
19 have any conversations with Jason about what  
20 he felt had happened that night?

21 A. I tried to. The next night I  
22 tried avoiding him. And instead I went to  
23 dinner with Mark Cuban who invited me to  
24 dinner, who is a lovely person. And he  
25 invited me to dinner, but in a completely

1 A. DELGADO

2 plutonic way. He was just interested in  
3 getting to know the Trump advisers. He is a  
4 wonderful man. And Jason showed up where we  
5 were. And then said we got to go back to  
6 the Trump Hotel where everybody is in the  
7 lobby. Yes, sure, Boris and everybody was  
8 there. And even though I tried shaking him,  
9 again, the same thing, let's talk, we could  
10 talk about what happened last night. There  
11 was no way to shake him without leaving the  
12 Campaign, and going back to what? To a job  
13 with a Latino organization that wouldn't  
14 want me back versus just seeing it through.

15 Q. Did you tell Jason whether that  
16 night, or any time in the next couple of  
17 nights, that he had sexually assaulted you?

18 A. Not in so many words. I didn't  
19 want to anger him.

20 Q. Did there come a time where you  
21 had another sexual interaction with Jason?

22 A. Yes. I flew home after Vegas,  
23 because I wanted to like, the whole thing I  
24 just wanted to wash it off me. And the next  
25 thing I know he is like texting me, like



1 A. DELGADO

2 hey, I was supposed, Hope was supposed to go  
3 down to Trump Doral with D.J.T., we called  
4 him D.J.T. or with the big guy. And instead  
5 I found a way -- I am replacing her on the  
6 plane and I am coming down.

7 That's when I went to -- he  
8 invited me to come see him to talk about  
9 Campaign work, I mean, it is my boss.

10 And what do you do? There is  
11 nothing you could do. You have already  
12 opened that door. There is nothing. My  
13 only backtracking would be to royally piss  
14 him off, and I am screwed then. Then I have  
15 no Campaign job and no legal job. And I  
16 have already gone on National TV defending  
17 the most toxic, controversial person in the  
18 world, I am screwed legal job wise. And if  
19 I piss this guy off, I am screwed out of the  
20 Campaign and the White House job. Little  
21 did I know, I would be screwed out of it  
22 anyway by becoming pregnant.

23 Q. Approximately how long after did  
24 this first interaction happen, the next time  
25 you had a sexual encounter with Jason, how

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A. DELGADO

many days or weeks after the first time?

A. Maybe a week.

Q. And you said it was in Florida?

A. In Miami, at Trump Doral.

Q. Were you intoxicated that day?

A. No. I was not intoxicated that day. I went forward with it, because I didn't have much. And after that, since then too, because what am I going -- you got to know when you are screwed and you don't have options.

Q. Did you tell Jason, no, I don't want to do that or anything like that?

A. No, I couldn't. That would have made it all ten times worse. And then the sexual assault still happened. And I still feel disgusting. And I don't have any job in the White House and I don't have a job and everybody in Trump world hates me and probably thinks I am lying. That's not a viable option.

Q. Did there come a time that you had another sexual encounter with Jason?

A. Yes, from then on. I had to play

1 A. DELGADO

2 along and try to make myself move along with  
3 this and move forward.

4 Q. Is it your testimony that every  
5 sexual interaction you had with Jason  
6 starting from the first one to the end was  
7 un voluntary?

8 A. I think that's a conclusion, the  
9 word involuntary, how do you define  
10 involuntary or voluntary, it is something  
11 that is complicated.

12 Q. You had never told him no, you did  
13 not want to participate; correct?

14 MR. PHILLIPS: I preserve an  
15 objection on that.

16 A. Well, do you mean ever? Well, the  
17 first time I don't even think I was  
18 conscious.

19 Q. So following that?

20 A. Sorry, I am talking over you, you  
21 are talking over me, I am sorry, go ahead.

22 Q. We were just trying to understand  
23 the word "voluntarily." I am trying to  
24 understand following that first interaction  
25 in Las Vegas, I believe you testified that

1 A. DELGADO

2 you never told Jason no or stop or I don't  
3 want to do that; is that correct?

4 A. No, I did tell him I didn't want  
5 to the next time.

6 Q. And what did he say in response to  
7 that?

8 A. I wish I could remember. I am not  
9 going to put words. As much as I don't like  
10 the guy, I am not going to put words in his  
11 mouth, if I don't recall exactly what he  
12 said. I can't speculate what the exact  
13 words were.

14 Q. Approximately how many total times  
15 would you say you had sexual interaction  
16 with Jason between October and December '16?

17 A. Over a dozen, maybe over two  
18 dozen.

19 Q. And the way you described the  
20 first encounter in Las Vegas, the second  
21 encounter in Miami, do you recall the  
22 physical locations of any other encounters?

23 A. Sure, his apartment, where we were  
24 respectively staying in New York, my hotel  
25 or my apartment or his apartment.

1 A. DELGADO

2 Q. Did you ever have a sexual  
3 encounter with Jason inside Trump Tower?

4 A. No, never. I would have never  
5 disrespect Trump Tower that way, never.

6 Q. When you say his apartment, was  
7 that a temporary apartment or permanent  
8 apartment, to your knowledge?

9 A. The temporary one he was assigned.  
10 I remember the place was called Beekman  
11 Towers.

12 Q. Was that near one of the  
13 apartments that you had on the East Side?

14 A. Yes, they tended to put us all  
15 somewhat close to each other. It was  
16 probably a mile or two away.

17 Q. Prior to the election on  
18 November 8 of '16, did you tell any Campaign  
19 workers that you had engaged in a sexual  
20 relationship with Jason?

21 A. Prior to when?

22 Q. Prior to the election on  
23 November 8 of 2016, did you tell any  
24 Campaign workers that you had engaged in a  
25 sexual relationship with Jason in any

1 A. DELGADO

2 manner?

3 MR. PHILLIPS: Other than  
4 Mr. Miller?

5 MR. BLUMETTI: Other than Mr.  
6 Miller.

7 A. No.

8 Q. To your knowledge, prior to  
9 election night, let's say, were any Campaign  
10 workers aware that you had engaged in a  
11 sexual relationship with Jason?

12 A. To my knowledge, no. Maybe  
13 someone saw something and suspected, I don't  
14 know.

15 Q. During this time period of these  
16 sexual encounters with Jason, did you  
17 exchange any personal text message with him  
18 that were unrelated to your work for the  
19 Campaign?

20 A. Yes, I tried to sound and be as  
21 normal possible.

22 Q. And what did you do by way of  
23 example to sound and be as normal as  
24 possible?

25 A. Sound upbeat and friendly, sound

1 A. DELGADO

2 upbeat and friendly, and you know, normal.

3 Q. Did you exchange text messages of  
4 a personal nature with Jason on a daily or  
5 weekly basis?

6 A. I don't know if every day, but  
7 regularly.

8 Q. Do you have any of these text  
9 messages, Ms. Delgado?

10 A. I had them at one point. They  
11 have been produced somewhere.

12 MR. BLUMETTI: To the extent you  
13 still have them in your possession,  
14 custody or control, we will call for  
15 production of any text messages of a  
16 personal nature that exchanged between  
17 Jason and Ms. Delgado.

18 Q. In your communications or conduct  
19 towards Jason, did you give him the  
20 impression that the two of you were dating?

21 A. I don't know how to answer if I  
22 gave someone the impression, you would have  
23 to ask him that.

24 Q. Did Jason ever tell you that he  
25 believed the two of you were dating?

1 A. DELGADO

2 A. No, that would be a weird thing to  
3 say. I don't know, no.

4 Q. Did Jason ever tell you that he  
5 felt that you two were involved in a  
6 romantic relationship?

7 A. Yes.

8 Q. Did you say anything in response  
9 to that, Ms. Delgado?

10 A. I don't recall what I would have  
11 said. I would have probably played along.

12 I was trying to convince myself.

13 Q. Did Jason ever make any  
14 discriminatory comments to you prior to the  
15 '16 election?

16 A. Sorry, I don't understand the  
17 question, discriminatory on what grounds?

18 Q. Well, you are making allegations  
19 of gender, sex and pregnancy discrimination  
20 in this lawsuit. Did Jason prior to  
21 election night, after we will do after  
22 election night as well, prior to election  
23 night, did Jason ever make any comments to  
24 you that you thought were derogatory or  
25 discriminatory on the basis of your sex or



1 A. DELGADO

2 gender?

3 A. Prior to election night, no.  
4 After election night is a different story.  
5 But prior to the election night, the only  
6 discriminatory one that I could recall at  
7 this time is he said he and Kaelan Dorr  
8 right before I had been hired had been  
9 drooling, was the word he used, over a photo  
10 in my Instagram that I had posted from some  
11 time I was in Austin in a bikini. I found  
12 that was inappropriate.

13 Q. Did you say anything to anybody at  
14 work about that?

15 A. No. One would be seen as  
16 difficult if you say that.

17 Q. I didn't hear what you said?

18 A. One be would be seen as difficult  
19 raising those comments. No comment.

20 Q. Did anybody at the Campaign give  
21 you the impression that you would be seen as  
22 difficult had you told anybody that Jason  
23 and Kaelan had made that comment to you?

24 A. Well, yes, it was the type of war  
25 room where people made fun of CNN anchors in

1 A. DELGADO

2 their 30s being too old. This is not  
3 exactly an environment of sensitivity.

4 Q. And you were referring to the  
5 comment that Bryan Lanza had made?

6 A. Yes. There were similar other  
7 comments along the same lines. It is not an  
8 environment that is open to women speaking  
9 up.

10 Q. Any other comments come to mind,  
11 by Bryan or otherwise?

12 A. Jason made fun of Kelly at  
13 Conway's bris once, calling him shriveled up  
14 fun bags, even though she is not old, she  
15 had a perfectly nice figure. There were  
16 comments about my accent.

17 Q. Who made the comments about your  
18 accent?

19 A. Boris had made the comment about  
20 my accent.

21 There was once a comment about  
22 Sarah, I hate to say this, because I love  
23 her, there was a comment about her weight  
24 and her looks and that Trump wouldn't want  
25 her representing him.

1 A. DELGADO

2 Q. And who made that comment?

3 A. I would not be able to ascribe it  
4 to the particular person, because when it  
5 was made, it was a group of guys sitting in  
6 the front. And I can't recall who was  
7 sitting in the group who said it, because I  
8 was walking by, and I heard it.

9 There was another comment about  
10 Kayleigh McEnany, who at the time was a CNN  
11 pundit who was very pro Trump. And Boris --  
12 I think, Jason had said, oh, she just texted  
13 me, because she used to text Jason,  
14 different hits she had done, just like from  
15 the outside being like, hey. And they said,  
16 Boris goes, oh, you mean Richard. And I  
17 said, Richard? He goes, yes, Dick, Richard.  
18 I said what are you talking about?  
19 Kayleigh, not Richard has texted a hit. No,  
20 that was her name, Dick. Richard was her  
21 nickname at Fox News, because that's how  
22 much she slept around when she was an intern  
23 there.

24 These were the types of comments.  
25 And that's just a sampling that made me feel

1 A. DELGADO

2 like keep your mouth shut.

3 Q. Any comments of a gender or  
4 sex-based nature towards you other than that  
5 comment that you said before about Jason and  
6 another individual drooling over your  
7 Instagram photo?

8 A. Before the election?

9 Q. Yes.

10 A. I can't recall at this moment. I  
11 am sure if you give me some time, I will  
12 probably think of something. If I go  
13 through the list again in my head of the  
14 people, I probably could.

15 Q. If something comes up, feel free  
16 to interject?

17 A. Thank you.

18 It is just a lot.

19 Q. Did you ever make any complaints  
20 or comments to anybody on the Campaign  
21 regarding these comments you overheard  
22 whether with respect to Sarah, Kayleigh,  
23 Kellyanne?

24 A. It is tough, because it is either  
25 a colleague who is at my same level and I

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A. DELGADO

certainly don't want to make an enemy or it is my own supervisor who is making the comments. So who am I going to go to?

Q. Just a yes or no answer?

A. Not that I can recall. Maybe once about one comment I did. I would have to go back and see.

Q. Do you have a specific knowledge of making a complaint about any particular comment?

A. I think I e-mailed Kellyanne when Hope made the comment about the accent, because that was already like the second time it happened it, first Boris and now Hope. It just kind of hurt me more, because it was the second time and I know Hope, she comes from a very wealthy family. And it just kind of hurt more, you see me as less than because my accent is not something you are used to hearing, it hurt.

Q. Are you asserting race discrimination claims in this lawsuit?

A. That is something to discuss with my attorneys. I don't know if I could speak

1 A. DELGADO

2 to that.

3 Q. Do you know on review of your  
4 first amended complaint whether previously  
5 or today, whether there are any factual  
6 allegations or claims relating to race  
7 discrimination?

8 A. I don't know if that's in there.  
9 It has been a while since I read it. If it  
10 is not in there, then it is not in there.

11 Q. Were you alleging that the  
12 Campaign discriminated against you prior to  
13 the election?

14 A. When you use the word  
15 discriminatory, I think that has a legal  
16 connotation which I am not qualified to  
17 answer.

18 Q. You are a lawyer?

19 A. Not in this case, with all due  
20 respect.

21 MR. PHILLIPS: Object to the form.

22 Q. Did the Campaign prior to the  
23 election behave in any specific manner that  
24 you felt impacted you as a woman?

25 MR. PHILLIPS: Object to the form.

1 A. DELGADO

2 A. Impacted me as a woman?

3 Q. Treated you differently as a  
4 woman?

5 A. Yes, the comments alone, I think,  
6 obviously, I feel.

7 Q. Comments either directly towards  
8 you or about other women in your presence  
9 you are referring to?

10 A. I mean, it is not fun when you are  
11 30 something yourself hearing about comments  
12 about looks and age, always about women. It  
13 was never about men who is 30 something  
14 being past his prime. In fact, the men  
15 saying it were 30 something. So I suppose  
16 my answer would be yes.

17 Q. Any other ways that come to mind  
18 that you believe the Campaign treated you  
19 differently on the basis of your sex prior  
20 to the election other than what we just  
21 discussed?

22 A. Not that I could specifically  
23 recall at this time.

24 Q. Prior to the election, and if you  
25 come up with something a little bit later,

1 A. DELGADO

2 feel free to interject, did any other  
3 Campaign workers say or do anything which  
4 you believed to be discriminatory, that is  
5 treated you differently?

6 A. Prior to the elections did any  
7 Campaign worker?

8 Q. Other than what we just discussed?

9 A. Not that I can recall at this  
10 particular time. Maybe later I will.

11 Q. Did Sarah Sanders work on the  
12 Campaign before you started working for the  
13 Campaign?

14 A. I can't recall.

15 Q. How about Boris Epshteyn, did he  
16 work for the Campaign before you started  
17 working for the Campaign?

18 A. That does ring a bell that Boris  
19 and I started right around the same time, I  
20 think.

21 Q. We already discussed where you,  
22 Boris, Sarah and Omarosa fell on the chart  
23 so to speak, pretty even, is that fair to  
24 say?

25 A. Yes. And by the way, I should



1 A. DELGADO

2 qualify, when you say work, you mean  
3 formally join the Campaign or was doing work  
4 unpaid or paid for the Campaign, because if  
5 so, then I was the earliest.

6 Q. I was going to say formally join,  
7 along the lights of the consulting agreement  
8 where you are technically an independent  
9 contractor or employee of the Campaign being  
10 paid by the Campaign is what I meant?

11 A. Yes, I wouldn't know when they  
12 signed. I would just know when someone  
13 physically started advocating for Trump paid  
14 or unpaid, because I saw that as an observer  
15 and as a participant. And I know I was  
16 definitely the earliest. Maybe Omarosa was  
17 around the same time, because I know she was  
18 an early Trump proponent too. But Sarah was  
19 not. And Boris was also very early, not too  
20 long after me.

21 Q. Did Donald Trump tell you that you  
22 could work in the White House if he won the  
23 election?

24 A. Absolutely on several occasions.

25 Q. Starting with the first time,

1 A. DELGADO

2 let's break it down, each instance, what  
3 exactly did Mr. Trump say to you, where were  
4 you, et cetera?

5 A. The first time was the first time  
6 we met, which was in Austin. And that's  
7 when he said that he was glad I was joining,  
8 I think he said something like -- he said, I  
9 am never going to disappoint you, I am so  
10 grateful. He said that like three times, he  
11 was so grateful and that he loves what he  
12 has seen of me. He says when I win this  
13 thing, you are coming with me. When I win  
14 this thing, you are coming with me.

15 Q. Just let me stop you there,  
16 Ms. Delgado, what did you take that to mean?

17 A. Coming with him to the White  
18 House.

19 Q. What did you say in response, if  
20 anything?

21 A. Just nod and say yes, we are going  
22 to win this thing, sir. I am paraphrasing  
23 what I would have said. I don't recall my  
24 exact words.

25 Q. You said this was in Austin,

1 A. DELGADO

2 Texas?

3 A. Yes, backstage at the Fox News  
4 Town Hall.

5 Q. Do you know if anyone overheard  
6 this conversation between the two of you?

7 A. Who was standing there? I don't  
8 recall. I would be speculating.

9 Q. Before we get to the next  
10 instance. Did Mr. Trump ever say anything  
11 along these lines to you in writing?

12 A. He is not one to put a lot of  
13 things in writing.

14 Q. So no?

15 A. No. I would not have expected it  
16 is what I was trying to say, he doesn't.

17 Q. The next instance?

18 A. The next instance, and there is  
19 probably more of these, I am just giving you  
20 the one that I could think of.

21 Q. To your knowledge, what you  
22 remember?

23 A. Thank you.

24 But the next I can recall was, was  
25 it September of 2016? We were on the plane,

## A. DELGADO

1 we had flown down from New York for a rally  
2 I think in West Palm or we flew down to  
3 Doral and from Doral we were going to the  
4 West Palm rally, and he said it on the  
5 plane. And I can't recall if it was the  
6 plane from New York to West Palm or did we  
7 take -- I think we might have taken a plane  
8 from Doral to West Palm even though it is a  
9 really short trip, I don't want to be  
10 specific on the plate route itself. We were  
11 on the plane, I had been on the plane  
12 several times with him. And again, he made  
13 the comment, he was talking, complimenting  
14 me, some story about this sounds conceded,  
15 and I don't mean to endorse what he said,  
16 but he said -- Steven Miller was talking  
17 something about some single bars that he had  
18 gone to that is supposed to have like good  
19 looking women. And everyone was kind of  
20 joking and laughing about that. And Trump  
21 said if A.J. walked in, all the men would  
22 start crying and they would not know what to  
23 do with themselves. I don't endorse that.  
24 That was just what Trump said. We were  
25

1 A. DELGADO

2 chatting after that. Again he said, well, I  
3 said something about my dog in Miami,  
4 something I think it was. He said well,  
5 when we win, you are coming with me. Kind  
6 of like don't think you are staying in  
7 Miami, you are coming with me. So that was  
8 the other time that I remember. And the  
9 reason I remember that one that much was  
10 because of the joke that he had made  
11 earlier.

12 Q. And Sean Miller was present during  
13 that conversation?

14 A. Yes, he was the one talking about  
15 this. It was some bar that was supposed to  
16 be like a hot like singles spot.

17 Q. What did you interpret Mr. Trump's  
18 comment to mean this time around?

19 A. When we win, we go to the White  
20 House.

21 Q. Did you say anything in response?

22 A. I would be speculating, I would  
23 say something like okay, great, sir, yes, we  
24 are going to win, that type of positive,  
25 what anyone would have said.

1 A. DELGADO

2 Then what is the next one I can  
3 think of. When we are backstage at the Bay  
4 of Pigs thing. They are people -- also when  
5 we were backstage at the West Palm rally I  
6 remember Nelson Diaz who is like the head of  
7 the New York Republican Group in Miami. He  
8 is a lobbyist at Ballard Partners. He told  
9 me afterwards he was taking a back, he said  
10 I didn't know you and Trump were so tight,  
11 because literally when Trump walked in,  
12 there were literally 50 people backstage and  
13 he starts going where is A.J., where is my  
14 A.J. Everybody looked at me, like oh, my  
15 God. Every time I would see Trump, it was  
16 like there he goes to A.J., like two peas in  
17 a pod. Not in an appropriate way, we used  
18 to talk about golf, because my dad is into  
19 that. We had the same sense of humor, he is  
20 where is she. We would link heads and start  
21 talking. I would show him funny things from  
22 Twitter on my phone, things people were  
23 tweeting.

24 Backstage at the Bay of Pigs was  
25 it was the same, the Bay of Pigs museum. He

## A. DELGADO

1  
2 was like what do you think I should say? I  
3 had written a speech for him that Steven  
4 Miller didn't end up using. And he asked  
5 me, we were talking about what he should  
6 say. He seemed a little bit nervous, I used  
7 some like Rocky reference. This is why, he  
8 said I won't forget what you have done for  
9 me. Because I think he was kind of taken  
10 aback, he loved my speech. And he read it,  
11 and he almost seemed a little emotional  
12 after he read it. It was a real good  
13 speech. And he looked at me, he said you  
14 know, I am not going to forget what you have  
15 done for me. I said, I just want to you to  
16 do one thing. And he said what? And I said  
17 win. He just kind of looked at me, and said  
18 come on, Rocky 2. He started laughing, and  
19 he goes McEntee, get over here, to John  
20 McEntee, me and my cheesey references. That  
21 one sticks out in my mind, because of the  
22 Rocky 2 thing. It came about because he  
23 saying I am not going to forget what you  
24 have done for me, and mine saying what you  
25 could do for me is win.

1 A. DELGADO

2 He goes, get ready, again, the  
3 same thing, you are coming with me, get  
4 ready, you are coming with me.

5 Q. And did anybody overhear this  
6 conversation in the Bay of Pigs Museum,  
7 other than John McEntee?

8 A. So when Trump is talking to  
9 someone, most people, at least people who  
10 are respectful, you kind of give the person  
11 their time with Trump, I know I did. When I  
12 was talking to him, it was not common to  
13 have somebody like lurking on top of us.  
14 And I will give Hope credit, Hope was very  
15 elegant about always kind of giving, that  
16 person has their time with Trump. And  
17 McEntee was kind of like the valet. He was  
18 always out and keeping his eye out, he was  
19 always like ten feet away. We always had  
20 like our huddle, Trump and I.

21 I know Steven Miller was on the  
22 plane when he said the comment on the plane.

23 Bay of Pigs Museum was someone in  
24 earshot? I don't think Trump would deny  
25 saying it. Ask Trump, I don't think he



1 A. DELGADO

2 would deny it.

3 Q. When you referenced the West Palm  
4 rally, were you referencing that in the  
5 context of what you said that Mr. Trump  
6 sought you out or were you referencing that  
7 to say that he also made some sort of  
8 comment to you on that occasion as well  
9 about his upcoming appointments?

10 A. No, I was just using that as a  
11 helpful example of just how I did have these  
12 conversations with him. Because every time  
13 he was somewhere where I was, he would seek  
14 me out. And also as an example for you, to  
15 see that there are witnesses, perhaps, not  
16 to the conversations, but witnesses that you  
17 are free to ask, witnessed and were taken  
18 aback by how much of a fan Trump was of me,  
19 as much as I was of him. To his credit, I  
20 appreciated that he appreciated my work and  
21 my investment.

22 Q. I want to circle back to your  
23 First Amended Complaint. Paragraph 35, it  
24 said, "Indeed at least on three separate  
25 occasions Donald Trump personally promised

1 A. DELGADO

2 Ms. Delgado that if he won the election she  
3 would be set in the White House in a prime  
4 role."

5 A couple of questions. Did  
6 Mr. Trump ever use the word "promise"?

7 A. Not that I can recall. In my book  
8 of promise, you rarely say the word  
9 "promise," it could also just be conveyed.

10 Q. "In a prime role," did Mr. Trump  
11 ever say one way or the other, if you were,  
12 quote, sent, how you would be sent?

13 A. When he says you are coming with  
14 me, that's to the West Wing, that's not you  
15 will be five floors down.

16 Q. Did he say that to you or is that  
17 your interpretation of his comments to you?

18 A. Did he say the words prime White  
19 House role? I don't believe he said that  
20 phrase.

21 Q. Did you believe that Mr. Trump  
22 could have guaranteed you a role in the  
23 White House?

24 A. Yes, it is his White House.

25 Q. Other than the fact that he would

1 A. DELGADO

2 be the incoming president in the  
3 administration, did you have any basis to  
4 assert that that individual can guarantee  
5 someone a role in the White House?

6 MR. PHILLIPS: I will preserve an  
7 objection.

8 THE WITNESS: Do I answer?

9 MR. PHILLIPS: Yes.

10 A. Same answer, it is his White  
11 House. He could even override security  
12 clearances like he did for Ivanka, Jared,  
13 Stephanie Kershaw and many others who had  
14 criminal records and were in the White House  
15 and in the West Wing. It is his White  
16 House.

17 Q. Where were you, I hate to use the  
18 word physically, where were you physically  
19 located on election night?

20 A. In New York at the Trump Tower  
21 with Mr. Trump on 414 in the war room.

22 Q. For how long had you been in New  
23 York prior to election night?

24 A. I can't recall, several days, at  
25 least, at least.

1 A. DELGADO

2 Q. Do you recall the last date that  
3 you were in before you returned to New York  
4 before the election?

5 A. I don't recall.

6 Q. For how long did you remain in New  
7 York following the election, on November 8  
8 of '16?

9 A. I don't recall.

10 Q. Do you know if it was more or less  
11 than a week?

12 A. I don't recall.

13 Q. Did your work for the Campaign,  
14 what you were doing for the Campaign between  
15 August and election night, come to an end  
16 following the election?

17 A. No.

18 Q. Did you continue to perform work  
19 on behalf of the Campaign following the  
20 election?

21 A. We all did, yes.

22 Q. What sort of work did you continue  
23 to perform on behalf of the Campaign? How  
24 did it differ, if at all, from what you were  
25 doing prior to the election?

1 A. DELGADO

2 A. The same type of work, just not so  
3 much -- actually you still had talking  
4 points, but they were no longer about  
5 Hilary.

6 Q. Were you still doing media  
7 appearances on behalf of the Campaign  
8 following the election?

9 A. Yes, we all had to do media.

10 Q. Do you recall whether Omarosa,  
11 Boris and Sarah, continued to do the media  
12 appearances on behalf of the Campaign  
13 following the election?

14 A. I believe they did, but I am not  
15 certain.

16 Q. I want to circle back to your  
17 consulting agreement, paragraph 3, I want to  
18 look at the term. It says, "Our agreement  
19 shall continue through November 10, 2016  
20 unless either party terminates the agreement  
21 earlier by giving ten days written notice to  
22 the other party."

23 So is it your testimony that you  
24 continued to work in a consulting role on  
25 behalf of the Campaign following this

1 A. DELGADO

2 November 10 term?

3 A. Yes, in fact, I continued to  
4 receive paychecks from the Campaign.

5 Q. For how long did you continue to  
6 receive paychecks from the Campaign?

7 A. I don't recall. But your HR would  
8 have that if you need to.

9 Q. But I am asking you in your mind,  
10 approximately, do you recall whether it  
11 continued into November, whether it  
12 continued into December?

13 A. I think it continued through  
14 inauguration. Some of the Campaign -- some  
15 of the salary came from the Campaign and  
16 half from TFA. But again, for an exact, I  
17 would check. I still considered myself  
18 working for the Campaign. I was still  
19 receiving checks from the Campaign.

20 Q. To your knowledge, following the  
21 election on November 8 of '16, were you  
22 performing work on behalf of the Campaign or  
23 behalf of the Transition team or both?

24 A. Still the Campaign. No one is  
25 quite sure what the Transition team was. So

1 A. DELGADO

2 always the Campaign.

3 Q. Did you ever receive any pay from  
4 the transition team?

5 A. Yes, I think there were some  
6 checks from the Transition team.

7 Q. During which period of time were  
8 you paid by the Transition team, to your  
9 knowledge?

10 A. I don't recall.

11 Q. Do you know if it roughly mirrored  
12 the time period where you were receiving or  
13 continued to receive pay from the Campaign?

14 A. Sorry, say that again.

15 Q. The time period during which you  
16 received payments through the Transition  
17 team for work, did that mirror the time  
18 period during which you continued to receive  
19 pay from the Campaign, you said up until you  
20 believe the inauguration?

21 A. I am not sure.

22 Q. And you testified that you don't  
23 recall how long you stayed in New York  
24 following the election; is that correct?

25 A. Correct.

1 A. DELGADO

2 Q. At some point, you left New York  
3 following the election, is that fair to say?

4 A. Everyone does.

5 Q. It is not a trick question?

6 A. I didn't want to say I left, like  
7 I left it behind. Everyone would go home,  
8 come back, go home, come back as needed.

9 Q. Did there come a time when you  
10 returned to Florida?

11 A. Sure.

12 Q. Do you have any frame of reference  
13 whether a week or a month that you returned  
14 to Florida after the election?

15 A. I can't recall.

16 Q. After you did in fact return to  
17 Florida after the election, whenever that  
18 was, did there come a time when you returned  
19 to New York again before the inauguration,  
20 let's say?

21 A. Oh, of course, yes.

22 Q. Do you recall what you were doing  
23 in New York when you returned? Were you  
24 continuing to perform work on behalf of the  
25 Campaign?



1 A. DELGADO

2 A. Same job, yes.

3 Q. Who were you report to after the  
4 election?

5 A. The same person.

6 Q. Jason?

7 A. Yes.

8 Q. And you said that your duties and  
9 responsibilities didn't really change other  
10 than essentially the subject matter of the  
11 talking points?

12 A. Correct.

13 Q. Do you recall when you first  
14 started working for the Transition?

15 A. No.

16 I always worked for the Campaign.  
17 The Transition was some sort of nebulous  
18 thing nobody could really identify.

19 Q. Did you have a position on the  
20 Transition?

21 A. Yes, I believe so.

22 Q. Do you know what your position  
23 was?

24 A. There was an announcement. I am  
25 sure you could find it or I could.

1 A. DELGADO

2 Q. As you sit here, do you have any  
3 idea what that announcement said?

4 A. Who were the individuals appointed  
5 to the transition, because I remember Sarah  
6 was not on it, and she was hurt.

7 Q. Do you know why Sarah was not on  
8 the announcement?

9 A. No. And she called me upset about  
10 it. So I don't think she knew. I didn't  
11 know either.

12 Q. To your knowledge, did Sarah ever  
13 work on the Transition even following that  
14 announcement?

15 A. No. But she was still with the  
16 Campaign, and it was the same entity in a  
17 way.

18 Q. Did anyone report to you on the  
19 transition? I know that you continued to  
20 report to Jason, did anyone report to you?

21 A. Not that I could specifically  
22 recall.

23 Q. During that time period following  
24 the election, I understand that you were  
25 working for the Campaign and also the

1 A. DELGADO

2 transition simultaneously, so to speak, did  
3 you work on the computer, on the phone, on  
4 television, something else?

5 A. Did I work on the computer or on  
6 television?

7 Q. I am just trying to understand  
8 your day to day. Remember we talked about  
9 your day to day when it was only the  
10 Campaign in August and September of '16.

11 I am trying to understand your day  
12 to day following the election in November  
13 and December of '16?

14 A. I would be speculating. I would  
15 qualify it as similar.

16 MR. BLUMETTI: I am going to share  
17 my screen with you. I am going to show  
18 you an e-mail that I would like to mark  
19 as Defendant's Exhibit O.

20 Can you see this?

21 THE WITNESS: I can.

22 (Whereupon, an e-mail Bates  
23 stamped DEF 1759 to 1761 was marked  
24 Defendant's Exhibit O for  
25 identification as of this date by the

1 A. DELGADO

2 reporter.)

3 Q. This is an e-mail base stamped DEF  
4 1759 to DEF 1761. It purports to be e-mails  
5 between you and individuals names Emily Eng  
6 and Monica Block and Molly Michael.

7 Do you recall this e-mail?

8 A. No.

9 Q. Directing your direction to the  
10 middle e-mail on page 1, an individual named  
11 Emily Eng writes to you, with the subject:  
12 Presidential Transition Team Onboarding.

13 "Hi, Arlene, welcome to the  
14 Presidential Transition Team."

15 The date of this e-mail is  
16 November 14 of '16.

17 Does this refresh your  
18 recollection as to when you started working  
19 for the Transition?

20 A. No, I mean, it is just an e-mail  
21 saying welcome to the Transition team. I  
22 don't know if that means I was working for  
23 the Transition per se or what. The e-mails  
24 seems authentic.

25 Q. It looks like you provided the

1

A. DELGADO

2

Presidential Transitional Team badge

3

application, that's what you attached to the

4

response to the e-mail on November 15 of

5

'16, the attachment set forth here on page

6

3?

7

A. Okay.

8

Q. Do you recall, do you recognize

9

this application?

10

A. I don't recall this, but sure it

11

seems authentic.

12

Q. This is the address that you gave

13

at the beginning of your deposition?

14

A. Yes.

15

Q. In part 3, right here, paragraph

16

3, it says does the applicant have a

17

background investigation in process, and you

18

checked no.

19

To your knowledge, did the

20

Transition team conduct a background search

21

on you?

22

A. I guess if I put no there, they

23

were not conducting one. I don't know if

24

they did.

25

Q. I am asking you whether you know

1 A. DELGADO

2 one way or another whether they did,  
3 regardless of what you checked here?

4 A. No.

5 Q. Did you ever inform anybody at the  
6 Transition team, whether Monica, Emily,  
7 Molly, any of these individuals, about the  
8 injunction in Florida?

9 A. No, that's something that you list  
10 on the SB86, and you are asked about that  
11 and you are given a chance to list it and  
12 explain. That's not the SB 86.

13 Q. Is it your testimony that you  
14 filled out an SB 86?

15 A. No, because you are given that  
16 once you are given the White House role.  
17 And the Campaign denied me that, I never got  
18 to fill out SB 86.

19 Q. Did you ever get to fill out an SB  
20 87?

21 A. I think it is SB 86, I might be  
22 wrong, I think it is SB 86.

23 Q. Personally I thought it was 87?

24 A. You are probably right, don't bet  
25 on my guess.

1 A. DELGADO

2 Q. So is it your understanding that  
3 you would have been required to disclose the  
4 existence of that injunction or the travel  
5 restrictions in connection with that SB 86  
6 or 87 form?

7 A. Yes, when you fill out the SB 86,  
8 there is a section in there where you are  
9 asked if you have anything, I think it is if  
10 you have any protective order or restraining  
11 order. But then there is a section right  
12 underneath where you have a chance to  
13 explain, so.

14 Q. When you talked about receiving  
15 payment from both the Campaign and the  
16 Transition team, do you know whether you  
17 were paid more by the Transition team, more  
18 by the Campaign, split down the middle or  
19 something else?

20 A. I don't recall.

21 Q. The total amount that you were  
22 paid, did that mirror the rate of  
23 \$10,000 per month that was on your  
24 consulting agreement?

25 A. I think so, I am not sure.

1 A. DELGADO

2 Q. To your knowledge, following the  
3 election, did any individuals who worked,  
4 whether on the Campaign or the Transition  
5 team, make any complaints regarding your  
6 behavior or conduct at that time?

7 A. In the transition period?

8 Q. Right, following the election,  
9 regardless of whether we want to call it  
10 Campaign or Transition team?

11 A. Not to my knowledge.

12 Q. You referenced an individual name  
13 Kaelan Dorr before, who is Kaelan?

14 A. He is Jason Miller's assistant.  
15 He has been with Jason for years. And Jason  
16 literally brought him into the Campaign.

17 Q. So it is your understanding that  
18 Kaelan worked with Jason on Ted Cruz's  
19 Campaign prior to coming to Mr. Trump's  
20 Campaign?

21 A. Not worked with him, worked under  
22 him for him. He literally follows Jason for  
23 every job. I believe he didn't work for Ted  
24 Cruz, I believe he worked for Jason at  
25 Jamestown.



1 A. DELGADO

2 Q. What is Jamestown?

3 A. Jamestown Associates was Jason's  
4 firm. To be clear, Jason was always working  
5 for Jamestown. So he hadn't left Jamestown  
6 to go work for Ted Cruz or to go -- Kaelan  
7 was still working for him when Kaelan was at  
8 Jamestown.

9 Q. Is it your understanding that  
10 Jason consulted as an independent contractor  
11 for the Campaign through his entity  
12 Jamestown?

13 A. I don't know what the arrangement  
14 was. I would be speculating.

15 Q. But you understand that Jamestown  
16 is in fact Jason Miller or was Jason  
17 Miller's firm?

18 A. Yes, it was an ad firm he started.  
19 He no longer does it.

20 Q. How would you characterize your  
21 interaction with Kaelan, positive, negative,  
22 something else?

23 A. Very positive. I have no doubt he  
24 would now say that it was different because  
25 he is what I would consider Miller's pet.

1 A. DELGADO

2 But very positive. We got along well, I  
3 think.

4 Q. At that time?

5 A. I believe so. I mean, it is  
6 possible that someone didn't like me, but I  
7 think we got along well.

8 Q. Do you know whether Kaelan ever  
9 made any complaints regarding you to Jason?

10 A. Not to my knowledge.

11 MR. BLUMETTI: I am going to share  
12 an e-mail, I am going to share my  
13 screen with you. I would like to mark  
14 this Defendant's Q.

15 (Whereupon, an e-mail Bates  
16 stamped DEF 610 to 611 was marked  
17 Defendant's Exhibit Q for  
18 identification as of this date by the  
19 reporter.)

20 Q. This is an e-mail that was  
21 exchanged between Kaelan and Jason, I  
22 believe some e-mails from you as well,  
23 November 16, Bates stamped DEF 610 and DEF  
24 611.

25 I am going to show you the bottom

1 A. DELGADO

2 first to give you have some context here, so  
3 it goes reverse chronological, if you could  
4 read these e-mails for me and tell me when  
5 you need me to move up?

6 A. No problem. Okay, you could move  
7 up, okay, okay, okay.

8 Q. A couple of questions. First, the  
9 bottom couple of e-mails seem to suggest  
10 that you were looking to travel at least at  
11 one point from Miami to New York. Does this  
12 e-mail refresh your recollection of the fact  
13 that you were located in Florida on  
14 November 15?

15 A. It appears that I was at least  
16 based on the e-mail.

17 Q. On the bottom of the first page,  
18 you replied to Kaelan, "There was no need to  
19 reply with tired-level snark. This kind of  
20 unnecessary bitchiness towards me, Kaelan,  
21 is why you have become insufferable."

22 Do you recall sending this e-mail?

23 A. No, but I trust -- I mean, Kaelan  
24 and I had like a very open level of -- I  
25 would almost call it like brother sisterly.

1 A. DELGADO

2 This was kind of the e-mail, it is like hey,  
3 and we were fine after this too.

4 Q. Why are you accusing Kaelan of  
5 acting bitchy towards you?

6 A. I think there was a phone call, I  
7 am not sure I am referring to the e-mail.  
8 With travel, I would have called him. So I  
9 am not sure I am referring to what he wrote  
10 in the e-mail.

11 Q. Did you feel at this time in  
12 November of '16 that Kaelan was rude or  
13 obnoxious or bitchy towards you?

14 A. I think he was probably -- I still  
15 liked him and we still got a long. When you  
16 ask at this time, I see the date  
17 November 15, he was Miller's roommate. So I  
18 think he was probably annoyed by what was  
19 going, by the involvement.

20 Q. I am not sure I understand you, by  
21 what involvement?

22 A. Miller and I, our involvement  
23 which Kaelan --

24 Q. Knew of?

25 A. Knew of. I think that was kind of

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A. DELGADO

the underlying current here, which is understandable and pretty common. And I think we were fine after this. I mean, Miller is defending me here. So I think there is a phone call that is not referenced here.

Q. At the top of the e-mail, Kaelan writes to Jason, "As you said, Jason, (inaudible) among other things, I have been nothing but helpful to her, she is insane."

A. I don't think he is calling me insane, I think she is being insane, like you are being crazy. I don't think he actually thought I was crazy or insane.

Again, I think there is a phone call, because given how Miller is going dude, come on, man. It is clear that they are talking about two different things.

Because Kaelan would often book my travel over the phone. He would book everyones and often. And he would usually have you get on the phone, and say these are the flights, which one. It was not usually done over e-mail. So you are probably

1 A. DELGADO

2 seeing that out of context, and there was  
3 probably a phone call. That's what I am  
4 referring to saying he is being snarky.

5 Q. I am trying to understand the  
6 context?

7 A. There is something missing in  
8 that. That's why Jason is going, come on.

9 Q. Is it your testimony that when  
10 Kaelan referred to you as, quote, insane, it  
11 was more of in a joking and paternal type of  
12 way, as opposed to actually calling you  
13 insane?

14 A. No, I think it is a third option,  
15 of just, you are being crazy, like in that  
16 moment, you are being annoying, you are  
17 being crazy. But again, I think that e-mail  
18 is sort of helpful, because to me, it  
19 inflates in my case, because I do think it  
20 is rather shitty, I don't think I sound  
21 crazy in that e-mail, that's kind of a  
22 strong word to use. And that's how women  
23 are maligned in the workplace. I am not  
24 insane for saying, don't be snarky. That  
25 merits being called insane? I mean, I am

1 A. DELGADO

2 kind of at a loss there for words.

3 Q. Do you recall whether you might  
4 have said something on the phone call that  
5 may or may not have transpired that would  
6 lend more context to the use of the word  
7 "insane"?

8 A. Never. He was like a little  
9 brother, just sweet. I liked him, never,  
10 never.

11 Q. In 2016, when did you first learn  
12 that you had become pregnant?

13 A. Late November.

14 Q. Do you recall the specific date,  
15 by any chance?

16 A. No.

17 Q. So it was after the election on  
18 November 8 of '16 that you learned that you  
19 were pregnant; is that fair to say?

20 A. Yes.

21 Q. Was it after you submitted that  
22 application for White House complex security  
23 pass to the Transition team?

24 A. I don't know, I don't remember.

25 Q. On November 15, I am just trying

1 A. DELGADO

2 to give you a frame of reference?

3 A. I don't remember the exact date.

4 Q. Where were you physically located  
5 when you first learned that you were  
6 pregnant?

7 A. I think I took the P test in New  
8 York.

9 Q. Where were you staying in New York  
10 at the time?

11 A. I don't recall.

12 Q. Were you staying with Jason?

13 A. I never stayed -- we were never  
14 booked in the same -- I mean, when you say  
15 stay, you mean the Campaign booked us in the  
16 same place?

17 Q. Were you in the hotel or the  
18 apartment that the Campaign booked for him  
19 or vice versa?

20 A. When you say staying there, I  
21 always had my own place. I never was  
22 staying with him.

23 Q. Were you physically located in the  
24 same apartment or hotel with him when you  
25 first learned that you were pregnant?



1 A. DELGADO

2 A. I don't recall. I don't think I  
3 took the first P test when he was around.

4 Q. When did you tell Jason that you  
5 were pregnant?

6 A. Almost immediately after I  
7 learned, probably really like the next day  
8 or so.

9 Q. What did you say to him?

10 A. I am trying to remember if I did  
11 tell him the next day or so. It is probably  
12 within a few days, it is probably within a  
13 few days, not the next day.

14 Sorry, what was your next  
15 question?

16 Q. Just what did you say to him, sum  
17 and substance of your conversation?

18 A. Yes, just, I was waiting for the  
19 right way to say it. And I think we were in  
20 his room and I said, I am paraphrasing, I  
21 said I have to tell you something, I said I  
22 am pregnant. And that was it. It was not a  
23 big speech.

24 Q. So was it in person?

25 A. Yes.

1 A. DELGADO

2 Q. What did he say back to you?

3 A. He said, I was starting to think  
4 you were, because I had noticed that you  
5 were nauseated a few times. And then he  
6 said, this is going to be awkward because my  
7 wife is expecting. I said expecting what,  
8 foolish me, he said a baby. And I think  
9 that's when it dawned on me in that moment  
10 immediately that he had been lying that he  
11 was legally separated from his wife.

12 Q. Let's break that down a little  
13 bit. Nauseated, how did he know that you  
14 had felt nauseated?

15 A. I just remember him saying that.  
16 I don't know how he noticed. Maybe I said  
17 it while we were eating a few times, I feel  
18 nauseated.

19 Q. Is that what precipitated you even  
20 taking the pregnancy test in the first  
21 place?

22 A. No, I took it because I missed my  
23 period.

24 Q. Now, he said this is going to be  
25 awkward, my wife is expecting. What was

1 A. DELGADO

2 your understanding of Jason's relationship  
3 with his wife at that point, up until that  
4 point?

5 A. Based on what he had represented  
6 to me multiple times, he and his wife were  
7 legally separated. He lived in the basement  
8 of his home. And when I inquires why they  
9 had not filed any divorce papers. He said,  
10 and this makes sense to me, that they were  
11 waiting until after the election, because at  
12 the time they separated, which was during  
13 the Ted Cruz Campaign, they didn't want to  
14 draw any negative attention to him and his  
15 career.

16 Q. Where was their home?

17 A. Virginia.

18 Q. Had you ever been to his home in  
19 Virginia?

20 A. No.

21 Q. Had you ever met his wife?

22 A. No.

23 Q. Up until this point in time?

24 A. No.

25 Q. Had you ever spoken to his wife?

1 A. DELGADO

2 A. No.

3 Q. What did you say in response to  
4 his point to you that my wife is expecting?

5 A. I wish I could recall. I think I  
6 kind of like zoned out. I don't recall what  
7 I said. It was an eerily calm conversation.  
8 The next day, not at all, it was like Jekyll  
9 and Hyde for him. But I just don't recall  
10 what I said. I wasn't angry, just numb.

11 Q. How long after you had this  
12 conversation did you guys remain together,  
13 not in a figurative sense, like physically  
14 together?

15 MR. PHILLIPS: Objection to form.

16 A. To the extent, I am going to  
17 answer this by whatever qualifies the  
18 involvement we had, however you want to  
19 label that. He began almost instantly  
20 acting differently and pulling away. And at  
21 one point told me that I could not be seen  
22 waddling around the White House pregnant.

23 Q. We will get to that comment.

24 Any other things that he said to  
25 you that day when you first told him other

1 A. DELGADO

2 than what you have already recapped?

3 A. Any other what, I am sorry?

4 Q. Any other comments that he made to  
5 you that day? Did the waddling comment  
6 happen the same time you told him?

7 A. No, that came later.

8 Q. I am trying to break it down  
9 chronologically. What else was said that  
10 day when you told him, if anything?

11 A. I can't recall. The conversation  
12 was quite -- it is a lot to take in. So  
13 that evening, none. The next morning he  
14 asked me, when we were sitting on the couch,  
15 is there any chance you would terminate it  
16 for me? And that's when I got up and walked  
17 out.

18 Q. Did you stay with him that evening  
19 into the next day, stay in his place?

20 A. Do you mean the evening preceding  
21 the remark about the termination request?

22 Q. Yes.

23 A. Yes, when I told him it was  
24 already late, so I was already there for the  
25 evening. So I just stayed.

1 A. DELGADO

2 Q. And the next day he asked you if  
3 there is any chance whether you would  
4 terminate the pregnancy?

5 A. Correct. And that's when I got up  
6 and I grabbed my things, and he got quite  
7 physical. It clearly dawned on his face  
8 that I wasn't going to do it. And I think  
9 during the night he had kind of hoped that  
10 he could convince me. And I think it was  
11 clear on my face that that was not an  
12 option.

13 Q. When you say got physical, did he  
14 put his hands on you that day?

15 A. Yes, but I don't like talking  
16 about it. I am sorry, I don't like talking  
17 about it. I mean, not like punching me.

18 Do you need me to like --

19 Q. Just characterize it as best as  
20 you can?

21 A. I am trying to block it out so  
22 much. I got up, I grabbed my things. And  
23 he is a big guy, he has got really big  
24 shoulders, he is a strong guy. He has  
25 worked as what bouncer. And I just felt the

1

A. DELGADO

2

full force. He grabbed me by the shoulders

3

and he shook me, you can't have this baby.

4

And he shook me so hard that I like fell

5

back and hit my head. I never knew if I

6

fell back or if he pushed me back on the

7

table. There was like a high table where my

8

coat had been.

9

And his eyes were like black, like

10

demonic, like something had taken over,

11

horrible. I will never forget the look on

12

his face. I literally got like I felt I was

13

in a horror movie, I literally got so

14

scared, I grabbed my purse. I think I even

15

left some stuff that was on the table. I

16

grabbed my purse, I ran outside to the

17

elevator. And the elevator wouldn't come.

18

And then he stopped to get like shoes on. I

19

had a few seconds, I went into the elevator

20

just as he was coming out, right out of the

21

door, it is only about 20 feet, and the

22

elevator doors closed and I ran outside.

23

And I stopped the first tax I saw, and I

24

went straight to La Guardia and flew home.

25

And then he called repeatedly,

1 A. DELGADO

2 repeatedly, repeatedly, and I wouldn't  
3 answer. To what I will never abide, I will  
4 never abide someone, someone being physical,  
5 I can't. I just shut down, I shut down and  
6 I ignored all his calls.

7 Q. Had he ever been physical with you  
8 before?

9 A. No, he had not.

10 Q. Did there ever come a time prior  
11 to this conversation that you could recap,  
12 that you told Jason that you had a prior  
13 pregnancy?

14 A. Did there ever come a time prior  
15 to this?

16 Q. I am trying to understand, I am  
17 not so much worried about what he knows now,  
18 but as you were sitting there in late  
19 November of '16 during this altercation that  
20 you just described, was he aware that you  
21 had a previous pregnancy?

22 A. No. I had told him about the  
23 restraining order, but I had not mentioned  
24 that it was relating to a pregnancy. I  
25 don't think he knew that I had a prior



1 A. DELGADO

2 pregnancy.

3 Q. Did there come a time that you  
4 informed any other individuals at work,  
5 obviously aside from this instance with  
6 Jason, that you were pregnant?

7 A. Yes, I told Kellyanne and Steve in  
8 an e-mail.

9 Q. Approximately how long after your  
10 conversation with Jason?

11 A. A couple of weeks. I didn't know  
12 what to do, how do you handle this, who to  
13 go to, who would help me, who would stab me  
14 in the back, it is hard to know.

15 Q. When you say you took a cab  
16 straight to La Guardia, you went back to  
17 Miami?

18 A. Yes.

19 Q. How long did you stay in Miami  
20 then from this conversation?

21 A. I can't recall.

22 Q. Did you return to work at all  
23 before the inauguration, so between late  
24 November and mid January?

25 A. Yes, I believe so.

1 A. DELGADO

2 Q. Do you recall approximately how  
3 many times you returned to New York?

4 A. I can't recall.

5 Q. Did you see Jason in person during  
6 any of those times that you returned to New  
7 York?

8 A. Yes, I believe I saw him, yes, I  
9 definitely saw him after that. He  
10 apologized. And he finally got me to call  
11 him back, because at first he was saying he  
12 needs to call me back because we are making  
13 cabinet appointments and you should be in  
14 the loop. And then I still ignored him.  
15 And then Fidel Castro died. So he is like  
16 well, Fidel died and we need you to write  
17 Trump's remarks, you are Cuban and Fidel  
18 died and you have the chance to write the  
19 remarks for Trump. I had to, it was kind of  
20 my duty. I was still a professional and I  
21 still had my obligations to the Campaign,  
22 and we talked again because of that.

23 Q. Did you have any more sexual  
24 encounters with Jason after you told him  
25 that you were pregnant?

1 A. DELGADO

2 A. I can't recall, but I believe so.  
3 He was apologetic. And claimed he didn't  
4 mean it when he asked me to terminate it and  
5 that he would never be physical again.

6 MR. BLUMETTI: I am going to take  
7 another bathroom break. If we could go  
8 off the record.

9 THE VIDEOGRAPHER: We are off the  
10 record. The time is 1:33 p.m. eastern  
11 time.

12 (Luncheon recess taken.)

13 THE VIDEOGRAPHER: We are back on  
14 the record. The time is 1:55 p.m.  
15 eastern time.

16 (Whereupon, the record was read by  
17 the reporter.)

18 MR. BLUMETTI: I am going to mark  
19 Defendant's Exhibit R, DEF 840 to DEF  
20 841.

21 (Whereupon, an e-mail Bates  
22 stamped DEF 840 to 841 was marked  
23 Defendant's Exhibit R for  
24 identification as of this date by the  
25 reporter.)

1 A. DELGADO

2 Q. There are certain e-mails, I am  
3 going to go through them with you.

4 Here is the one, it starts with,  
5 "Here is an interesting juxtaposition"?

6 A. Okay.

7 Q. This appears to come from another  
8 e-mail account ajdelgado6@gmail.com, does  
9 that look like an e-mail that you recall or  
10 had?

11 A. That is my e-mail.

12 Q. Do you know who you sent this  
13 e-mail to? I think it is just the problem  
14 of the way the e-mail was recaptured, it  
15 doesn't show the send?

16 A. No.

17 Q. In the opening sentence, you said,  
18 "Here is an interesting juxtaposition that  
19 highlights the abuse I have received lately  
20 and how differently this was handled when a  
21 white male who is close to Hope was  
22 involved."

23 Who is the white male that you are  
24 referring to?

25 A. I think I saw when you scrolled

1 A. DELGADO

2 down earlier, I think it was about Corey.

3 Q. Which specific abuse are you  
4 referring to here?

5 A. The I think commentary, the  
6 abusive commentary.

7 Q. When you say abusive commentary,  
8 is that what you recaptured down here?

9 A. I don't know, I would have to  
10 read.

11 Q. Sure, if you could just give it a  
12 quick read, just so we have the full context  
13 here?

14 A. Can you scroll down some more.  
15 Yes, this is about the incident with the  
16 report, yes.

17 Q. You testified to this earlier, I  
18 am just curious what you meant by abuse,  
19 which specific abuse are you referring to?

20 A. I would consider anything -- not  
21 anything, I consider when there is a  
22 disparity between how a white male is  
23 treated and a Hispanic female is treated, to  
24 me that's abusive.

25 Q. And in your own words, how was

1 A. DELGADO

2 Corey or Hope treated differently than you  
3 in this particular situation?

4 A. Well, I would be summarizing what  
5 I wrote in the e-mail from seven years ago.  
6 I guess it is all in the e-mail. I would  
7 just refer you to the e-mail. It is much  
8 more fresh in my recollection in the e-mail  
9 than it is now.

10 Q. Was this e-mail the first time  
11 that you made any written complaints or oral  
12 complaints at work regarding differential  
13 treatment?

14 A. I can't recall. I think so, but I  
15 can't recall for sure.

16 Q. On 12/20/16, to your knowledge was  
17 Steve Bannon working for the Campaign or --

18 A. Campaign in my view.

19 Q. Is that just based on your  
20 observations or perceptions?

21 A. No, there was just never any  
22 formal like end of the Campaign. We were  
23 all still Campaign workers.

24 Q. Did every single Campaign worker  
25 that you worked with between August and

1 A. DELGADO

2 election night, the 16th, continue to work  
3 with the Campaign entity itself following  
4 the election?

5 A. I don't know.

6 Q. The same question for Kellyanne on  
7 December 20 of '16, in your mind was  
8 Kellyanne working for the Campaign, the  
9 Transition team or both?

10 A. I saw it as still the Campaign.

11 Q. Directing your attention in this  
12 e-mail, this e-mails actually shows the  
13 individuals to who the e-mail was sent.

14 The middle e-mail December 21 of  
15 2016 from you to Steve and Kellyanne, was  
16 this the e-mail that you referred to just  
17 prior to the break, when you advised them  
18 that you were pregnant?

19 A. Well, it is certainly an e-mail  
20 telling them I am pregnant. I don't know if  
21 this was the e-mail or the only, I don't  
22 recall.

23 Q. Do you recall sending an e-mail to  
24 them prior to December 21 of '16 about the  
25 fact that you were pregnant?

1 A. DELGADO

2 A. I don't recall.

3 This is definitely within a month  
4 of my knowing, though.

5 Q. And you said that aside from  
6 Jason, the first two individuals you told  
7 were Steve and Kellyanne; is that correct?

8 A. No, that would be my family.

9 Q. The first individuals at work?

10 A. I think that's accurate.

11 Q. The last third paragraph, you  
12 said, "Please be advised that I am over two  
13 months pregnant. The team refusing to do  
14 anything to stop this abuse which I have  
15 been asking for, for days is not okay."

16 The abuse to which you are  
17 referring, is that the same, quote, abuse  
18 that you said when you felt that you were  
19 treated differently in a similar situation  
20 than Hope and Corey were treated?

21 A. Than Corey was treated.

22 Q. Than Corey was treated?

23 A. Yes, that's what I am referring to  
24 there.

25 Q. You said that you have been asking



1 A. DELGADO

2 for this abuse to stop for days.

3 Do you recall whether you  
4 mentioned any such, you know, alleged abuse  
5 prior to the day prior to the date of  
6 December 16?

7 A. I think I probably mentioned it to  
8 Jason, that Hope seems really unnerved and  
9 kind of upset ever since I saw her with  
10 Corey. While it was common knowledge among  
11 many of us, it wasn't among all of us. So  
12 she seemed to be kind of -- I don't want to  
13 speculate, but seemed difficult towards me  
14 ever since then. She was probably  
15 uncomfortable with mine being around having  
16 seen what I saw, it was my understanding.

17 Q. Do you know whether Jason had  
18 relayed what you had said to him to others  
19 at the Campaign regarding how you were  
20 treated versus Corey?

21 A. I don't know.

22 Q. What was Hope's specific position  
23 on the Campaign or the Transition or both?

24 A. No one really knows what her  
25 position was. I don't.

1 A. DELGADO

2 Q. Do you know whether she worked in  
3 the Comms Department?

4 A. She certainly didn't go on TV or  
5 draft talking points. So I am not sure if  
6 she did work in Comms per se, I don't know.

7 Q. Do you know whether she reported  
8 to Jason Miller?

9 A. I don't know.

10 Q. Do you have any idea who she  
11 reported to?

12 A. No, I don't.

13 Q. Further up in the e-mail, it looks  
14 like approximately seven minutes after you  
15 sent your e-mail to A.J. and Steve, it looks  
16 like Steve forwarded that to Jason saying,  
17 "What is with the buried lede?"

18 To which Jason responds, "I will  
19 call immediately after the daily press  
20 briefing."

21 What does the phrase "buried lede"  
22 mean?

23 A. Well, I didn't write it.

24 MR. PHILLIPS: Object to the form.

25 Q. Are you familiar with the phrase

1

A. DELGADO

2

"buried lede"?

3

4

A. Somewhat. It is not a phrase I use often.

5

6

Q. In your mind, do you know what lede Steve believed to be buried?

7

8

9

10

11

12

13

A. I don't know, I don't know. I find it -- what sticks out at me, is that I find it interesting instead of replying to me, someone who has just told you she is pregnant, he is instead going to the guy and asking him what is up. How about replying to me?

14

15

Q. Did Steve ever respond to your December 21 e-mail?

16

17

18

19

20

21

22

23

24

25

A. No.

Q. Did Kellyanne?

A. No.

Q. Do you know why Steve forwarded your e-mail to Jason specifically?

A. I don't know.

Q. I don't want you to speculate, but my question is did Steve now at this time that you had engaged in a sexual relationship with Jason?

1 A. DELGADO

2 MR. PHILLIPS: Objection.

3 A. I don't know.

4 Q. Circling back to your Amended  
5 Complaint, paragraph 38, it says, that as  
6 you testified before, You informed Miller  
7 about the pregnancy, his initial response  
8 was to ask her to terminate her pregnancy.  
9 When she refused, he told her that she could  
10 not be seen, quote, waddling around the  
11 White House pregnant.

12 When exactly did Jason make that  
13 comment to you? I know you said it was not  
14 the initial conversation?

15 A. I think it was shortly thereafter.

16 Q. Did he make that comment to you in  
17 person or on the phone?

18 A. In person.

19 Q. So considering your testimony that  
20 you left and flew back to Florida soon  
21 thereafter, after you told him that you were  
22 pregnant, is it fair to say that he made  
23 this comment to you when you returned back  
24 to New York?

25 A. That would be fair.

1 A. DELGADO

2 Q. Did he say this to you in person  
3 or in writing?

4 A. I think I already answered, I said  
5 in person.

6 Q. Did you say anything in response  
7 to that comment?

8 A. I wish I could remember. I don't  
9 think so.

10 Q. Did you tell him not to say that  
11 or that is inappropriate or anything like  
12 that?

13 A. He is still my boss. So that's a  
14 tricky one.

15 Q. Did Jason apologize for making  
16 that comment to you?

17 A. Never.

18 Q. Did you ever ask him to?

19 A. No. To ask him to apologize for  
20 what he said?

21 Q. Yes.

22 A. I generally don't ask people to  
23 apologize for what they said.

24 Q. Why in your e-mail to Steve and  
25 Kelly on December 21 of 2016 didn't you

1 A. DELGADO

2 mention Jason?

3 A. Why didn't I mention Jason, in  
4 what context?

5 Q. When you sent that e-mail to Steve  
6 and Kellyanne on December 21, you said  
7 please be advised I am over two months  
8 pregnant, but you didn't mention Jason, you  
9 didn't mention that you believed him to be  
10 the father of the child, why not?

11 A. Well, I am trying to be as  
12 discrete as possible. That's also why I  
13 only e-mailed Steve and Kellyanne. You  
14 asked earlier who did I tell. I am trying  
15 to be as discrete, be as professional as I  
16 can.

17 Q. Why didn't you mention Jason's  
18 waddling comment to them in this e-mail, the  
19 same answer?

20 A. In writing, I don't think that's  
21 necessary. I am waiting for them to call  
22 me.

23 Q. Did you ever make any complaints  
24 of discrimination to Sarah Sanders?

25 A. No, but Sarah voiced complaints to

1 A. DELGADO

2 me about Boris, he made her cry once.

3 Q. Did she tell you what he had said  
4 or done that made her cry?

5 A. A lot of women complained about  
6 him. So it wasn't anything unique. In  
7 Sarah's case, it was he had literally like  
8 moved all of her stuff off of a desk he  
9 wanted. And then when she got there, he  
10 kind of gave her like a gruff or very rude  
11 remark. And she told me with like tears in  
12 her eyes. The reason I say that is because  
13 you asked -- I don't know if I reciprocated  
14 with something also that I had experienced  
15 similar with him, but possibly, but I don't  
16 recall.

17 Q. Did Sarah attribute this to gender  
18 based conduct on the part of Boris?

19 A. I believe so, because she had also  
20 on other occasions noticed, had others where  
21 Boris was just rude to the women, not to the  
22 men.

23 Q. Was Boris ever rude to you?

24 A. He made fun of my accent.

25 Q. Right, I understand you said that.

1 A. DELGADO

2 Did he ever make any gender based  
3 comments to you?

4 A. The little one about Kayleigh  
5 McEnany. I am not a huge fan of Kayleigh.  
6 But I think it is horrible to say that her  
7 Fox News nickname was Dick and she slept  
8 around. I don't have to be that person to  
9 be offended by that as a woman.

10 Q. No, I understand. I understand  
11 the comment that you testified he made about  
12 Kayleigh. I am asking did he ever make any  
13 gender based comments to you about you?

14 A. Not that I can recall the specific  
15 instance. Maybe some that are not  
16 appropriate. Like one day I was wearing  
17 some dress that he was like oh, Delgado, you  
18 clean up well, kind of like. But that's  
19 like the kind of thing, that was somewhat  
20 maybe like gender based, like you look hot.  
21 But that's the only example that currently  
22 comes to mind that I would consider gender  
23 based. At this time I can't think. But  
24 just general like gruff behavior, rude,  
25 gruff behavior.



1 A. DELGADO

2 Q. Do you know whether Sarah ever  
3 made any complaints regarding Boris's  
4 behavior?

5 A. I don't know.

6 Q. Did you ever make any complaints  
7 regarding Boris's behavior?

8 A. I think we all kind of vented to  
9 Jason about it.

10 Q. Do you know whether Jason ever had  
11 any conversation with Boris about his  
12 behavior?

13 A. I don't know if he did. Jason's  
14 approach was more, everyone hates him, even  
15 Eric can't stand him. He is done, he is  
16 out, he has like hung his own rope is what  
17 he told me once, like let it be. You only  
18 have to put up with it a little while  
19 longer.

20 Q. My question is do you know whether  
21 he ever said anything specific one way or  
22 another to Boris?

23 A. I do not know.

24 Q. Paragraph 39 of your complaint,  
25 you say, "Around December 21, 2016,

1 A. DELGADO

2 Ms. Delgado e-mailed Bannon and Kellyanne to  
3 inform them of the pregnancy."

4 Is that the e-mail we just saw up?

5 A. I believe so.

6 Q. In paragraph 40, you say "The  
7 following day, around December 22, 2016,  
8 Miller raised Ms. Delgado's pregnancy during  
9 a morning conference call with Preibus and  
10 Bannon, which has been scheduled to discuss  
11 Miller's appointment as White House Comms  
12 director, announced later that day."

13 Were you also a party to that call  
14 between the three of them.

15 A. No, I believe this was, this was  
16 in one of the books Miller talks about this  
17 or something. This has been reported on  
18 somewhere.

19 Q. One of the books?

20 A. One of the books with which Miller  
21 cooperated that are written about the Trump  
22 Campaign. This was in there, or Bannon has  
23 said this. I can later find the source for  
24 this for you.

25 Q. Are you saying that Jason goes

1 A. DELGADO

2 through this or participates in writing  
3 books on the Trump Campaign?

4 A. He has served as a source both on  
5 the record and off on multiple books, such  
6 as Vicky Wards, three of Michael Wolff's.  
7 He was never threatened with a \$1.3 million  
8 NDA violation like I was. He has openly  
9 contributed to books, which then write a  
10 favorable profile of him.

11 Q. Do you know what Steve said in  
12 response to that pregnancy news, if  
13 anything?

14 A. I don't know, I was not there.

15 Q. In paragraph 41, "Upon learning of  
16 Miller's appointment, you wrote or allege  
17 that Ms. Delgado called Bannon directly to  
18 confirm he was aware of her pregnancy, then  
19 reassured Ms. Delgado that everything would  
20 be okay, but refused to discuss her request  
21 for a job in the White House, promising  
22 instead that someone would reach out to her  
23 later that day to discuss the issue.  
24 Despite this promise, nobody reached out to  
25 plaintiff."

1 A. DELGADO

2 Why did you call Steve on  
3 December 22?

4 A. Again, I was trying to address  
5 things proactively. And I was concerned  
6 when I saw that Miller had been appointed  
7 when it was announced by an ABC News tweet,  
8 no heads up was given to me. Given that  
9 Miller had steadfastly said, you and I can't  
10 both be in the White House, you can't be  
11 seen waddling around the White House  
12 pregnant. When I see he is appointed, that  
13 likely means I am not, so that's why I  
14 called Steve.

15 Q. What did you say to Steve during  
16 that call? I know it is paraphrased here,  
17 but can you give more of sum and substance  
18 of what happened during that call?

19 A. I would be speculating.

20 Q. But you do recall that Steve  
21 reassured you that, quote, everything would  
22 be okay?

23 A. Yes, but as to the actual  
24 substance or sentences that were said, I  
25 would not be able to give you specifics.

1 A. DELGADO

2 Q. Did you raise any specific  
3 concerns with Steve?

4 A. Yes, I am pregnant and I need my  
5 job. And you guys just appointed the guy  
6 who said -- that would have been the gist of  
7 it, I am paraphrasing, you guys just  
8 appointed the guy that said he and I both  
9 can't be in the White House together because  
10 of my pregnancy, because I would be waddling  
11 around because it was embarrassing, so what  
12 is up? That kind of call.

13 Q. Why did Jason tell you that you  
14 both cannot be in the White House?

15 A. Well, I think it is obvious that  
16 you in a Republican administration. But you  
17 know what, maybe ask him. Let me not put  
18 words in his mouth.

19 Q. Did he ever give you an  
20 explanation for why he said that to you?

21 A. No. His position was simply, you  
22 can't be walking around the White House  
23 pregnant with my child.

24 Q. Did he have an expectation that  
25 people would learn that he was involved?

1 A. DELGADO

2 MR. PHILLIPS: Object to form.

3 A. I don't know what his expectation  
4 is -- was.

5 Q. I am only asking to the extent  
6 that he expressed that expectation to you?

7 A. He did not explain.

8 Q. When you raised these concerns to  
9 Steve, like you just said, do you recall  
10 anything that he said other than everything  
11 would be okay?

12 A. I know my feeling when I got  
13 off -- I can't speculate. I was cautiously  
14 optimistic when I got off the phone. But I  
15 don't recall.

16 Q. You said earlier that you knew  
17 Steve Bannon before you started working on  
18 the Campaign; is that correct?

19 A. Yes.

20 Q. How would you characterize your  
21 interactions with Steve in 2016?

22 A. Always very friendly. He was very  
23 fond of me. We have been friends since at  
24 least 2013. I was even a witness on his  
25 behalf of sorts when he was under FBI

1 A. DELGADO

2 investigation for registering a fake address  
3 in Florida. We had always had a good and  
4 respectful and friendly relationship.

5 Q. Did Steve during the time period  
6 that you were working for the Campaign ever  
7 make any derogatory or discriminatory  
8 comments to you?

9 A. No, not that I can recall.

10 Q. After Steve was made aware of your  
11 pregnancy in and around the time period that  
12 we are talking about, did he have make any  
13 derogatory or discriminatory comments  
14 regarding your pregnancy?

15 A. Not that I am aware of, not to me  
16 directly.

17 Q. That's what I am asking you, to  
18 you directly or in your presence?

19 A. No, he ghosted me.

20 Q. Aside from Steve ghosting you, did  
21 Steven engage in any conduct that you  
22 believed to be discriminatory?

23 A. Yes, what is in the complaint. Is  
24 that like a legal answer you are asking me  
25 for?

1 A. DELGADO

2 Q. No, it is not. I am just asking  
3 you whether Steve engaged in any conduct,  
4 action or inaction, which you believe to be  
5 treating you differently because you were a  
6 woman?

7 A. But I don't know what actions he  
8 engaged in or didn't engage in.

9 Q. I am asking in your mind, do you  
10 have any information?

11 A. Well, I think when you know a high  
12 level employee is pregnant, informs you of  
13 the pregnancy, you are informed of the  
14 pregnancy, when you just shut down on her,  
15 there is, I consider that to be telling. So  
16 that's the answer then.

17 Q. And anything other than that, the  
18 ghosting so to speak?

19 MR. PHILLIPS: Object to form.

20 A. I think appointing Miller itself  
21 is discriminatory and troubling, given that  
22 they were aware in advance of the  
23 appointment.

24 Q. Are you saying by virtue of the  
25 fact that Miller had impregnated you, that



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A. DELGADO

sort of unqualified him for the position in  
and of itself?

MR. PHILLIPS: Object to the form.

A. I am not a legal expert on -- I am  
not in their mind as what qualifies or  
doesn't qualify.

Q. I am just trying to drill down a  
little bit. You said that you believe that  
Steve's actively appointing Miller after  
being put on notice of the fact that he  
impregnated you, do you believe that to be  
differential treatment? I am asking you for  
the reasons why you believe that?

A. Well, you just have a married  
Campaign director impregnant his direct  
subordinate, you give him a job and you  
don't appoint her to one. Yes, the  
appointment of Miller in and of itself is I  
believe discriminatory on more than one  
ground.

Q. When was the last time you saw  
Steve?

A. Probably in the war room, probably  
in December.

1 A. DELGADO

2 Q. Of '16?

3 A. Yes.

4 Q. When was the last time you spoke  
5 to Steve?

6 A. That I can't recall.

7 Q. Was it this year?

8 A. No, it has been a few years.

9 Q. Do you recall what the sum and  
10 substance of your last conversation with him  
11 was?

12 A. No.

13 Q. Was it about your lawsuit?

14 A. I think like in 2018 he said  
15 something about Miller, how he knew Miller  
16 was like saying things about him. I was  
17 trying to get back on Steve's good grace at  
18 the time, because I really needed a job to  
19 support William.

20 So I think like we briefly  
21 chatted. And I was trying to be like as  
22 friendly as I could. That's all I could  
23 remember. I was really trying hard to get  
24 back in his good grace.

25 Q. Have you ever met Reince Preibus?

1 A. DELGADO

2 A. Yes, of course.

3 Q. When was the first time?

4 A. I don't know, I think at the RNC  
5 in the summer of 2016.

6 Q. The same event at which you met  
7 Jason?

8 A. Yes.

9 Q. How often would you say you  
10 interacted with Reince in 2016?

11 A. Hardly, because I would tell you  
12 why, the RNC people despised the Trump  
13 Campaign people, and thought we were in for  
14 a loss. And because of us, people like Abe  
15 Walsh and Brad Shaw and Reince, that we had  
16 ruined the conservative's chances of taking  
17 the White House. They treated us as though  
18 we had some sort of flesh-eating disease.  
19 So no, I didn't see Reince much or Daisy or  
20 any of the RNC people, until we won and they  
21 came in throwing elbows and acting like they  
22 owned the place. That's politics.

23 Q. Did Reince ever work for the  
24 Campaign?

25 A. No, he was at the RNC.

1 A. DELGADO

2 Q. Did Reince ever make any  
3 derogatory or discriminatory comments to you  
4 gender based?

5 A. No, we had almost no interaction,  
6 very few.

7 Q. After Reince was made aware of  
8 your pregnancy in or around this time, did  
9 he ever engage in any conduct which you  
10 believed to be discriminatory?

11 A. I don't know. I guess the RNC  
12 would know if they had any complaints or  
13 lawsuits.

14 Q. I am asking you about you  
15 specifically, did Reince ever say or do  
16 anything to you that you felt to be gender  
17 based?

18 A. No. We only talked a few times in  
19 person.

20 Q. When was the last time that you  
21 saw Reince?

22 A. I know it was in New York in the  
23 war room after we won. But I don't recall  
24 the month. It would have been late November  
25 or December, 2016.

1 A. DELGADO

2 Q. And when was the last time that  
3 you spoke to Reince?

4 A. It would have been then, perhaps  
5 even like a quick hello, how have you been.

6 Q. How about Kellyanne Conway, did  
7 she have ever make any derogatory,  
8 discriminatory comments to you?

9 A. There was an incident, as I  
10 alluded to earlier, people noticed how fond  
11 Trump was of me. There was one incident  
12 where we had all known down somewhere  
13 together. And Trump kept saying you are  
14 going to come to dinner, you are coming to  
15 dinner tonight at Mar-A-Lago. And then  
16 Kellyanne kind of cornered me by the  
17 bathroom and was like you don't want to come  
18 to dinner, why don't you go see your mom and  
19 take an Uber back to Miami and go see your  
20 mom, she probably has missed you because I  
21 had been in New York. To me that's a little  
22 bit discriminatory, because this is oh, this  
23 is another female and she always has like  
24 Trump's attention kind of thing. So if I am  
25 giving an honest answer, that would be the

1 A. DELGADO

2 incident that most sticks out in my mind.

3 Q. Anything other than that?

4 A. Not that I can recall at this  
5 time. I had so many conversations with  
6 Kellyanne, not that I can recall.

7 Q. Are you speculating that you felt  
8 that she said that to you because she wanted  
9 the attention to herself, did she ever say  
10 that to you?

11 A. No, I 100 percent felt that way at  
12 the time and still to do. I have been down  
13 the block, I know when things are said in a  
14 certain way and why you are cornered a  
15 certain way and encouraged to go see your  
16 mom and not come to dinner and why that is,  
17 I understand what was going on. But I don't  
18 like to ruffle people's feathers. So I went  
19 home, I took the Uber, because I liked  
20 Kellyanne, and I wanted to be a team player  
21 and not upset people.

22 Q. When did that happen, that  
23 situation that you just referred to?

24 A. It was like around the time of  
25 that West Palm rally. So I don't remember.

1 A. DELGADO

2 Q. Do you know what month it was?

3 A. I can even tell you what I was  
4 wearing, but I can't tell you the month.

5 Q. Was it before the election?

6 A. I believe it was before the  
7 election, yes.

8 Q. Did you ever make any complaints  
9 to anybody about Kellyanne's insistence that  
10 you go see your mom?

11 A. No, I don't like to complain.

12 Q. Did Kellyanne ever make any  
13 comments or insults to you regarding your  
14 pregnancy?

15 A. No, she never spoke to me about  
16 it.

17 Q. Did Kellyanne engage in any  
18 conduct other than what you just said about  
19 the Mar-A-Lago event which you believe to be  
20 discriminatory differential treatment?

21 A. No. But I will note that in  
22 January or February, I think it was, when I  
23 was going through the pregnancy alone, I was  
24 walking by a burger place where they were  
25 showing a rally, like a right-to-life rally.

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A. DELGADO

And Kellyanne was speaking. And she was speaking about the importance of letting single mothers and unwed mothers know that we are there for them. And that was tough, that was tough.

Q. When was the last time that you saw Kellyanne in person?

A. December in the war room, 2016.

Q. When was the last time you spoke to her?

A. When was the last time what, that I spoke to her?

Q. Yes.

A. It probably would have been in the war room in person if I saw her.

Q. Did you write any letters or e-mails or similar communications to Kellyanne after the inauguration?

A. What do you mean when you say similar e-mails?

Q. I meant similar communications, like a text message, e-mail, a letter?

A. Oh, I know I have had contacts with her since then. I know like through



1 A. DELGADO

2 George, I have said like, you know, your  
3 daughter is doing, she is a smart girl, she  
4 is so inspiring about their daughter, she is  
5 a firecracker, I love that. I am trying to  
6 think if I had any direct communications  
7 with her, I don't know, I don't recall.

8 Q. Did you ever send her any  
9 communications regarding your time working  
10 on the Campaign or the Transition team?

11 A. Did I ever what, I am sorry?

12 Q. Send her communications recapping  
13 or referencing your time working on the  
14 Campaign or the Transition team?

15 A. I don't recall.

16 Q. When you sent that e-mail to Steve  
17 and Kellyanne on December 21, you thought  
18 that Steve ghosted you, to use your words;  
19 right?

20 A. Yes.

21 Q. Did you feel that Kellyanne  
22 ghosted you too?

23 A. Sadly, yes. That's why it hurt so  
24 much when I was watching her say that on  
25 that screen.

1 A. DELGADO

2 Q. Why did you not sue Kellyanne in  
3 this lawsuit? Why did you only sue Steve?

4 MR. PHILLIPS: Object to form.

5 Just a reminder, to the extent that it  
6 was attorney/client privilege, you are  
7 not to answer.

8 A. That's what I was going to say,  
9 those were decisions made in communications  
10 with my attorneys.

11 Q. Your prior attorneys?

12 A. Yes.

13 Q. Why did you not sue Jason in this  
14 lawsuit?

15 A. Same answer.

16 Q. Circling back to your complaint  
17 which is still up, paragraph 41?

18 A. Okay.

19 Q. You said in the last sentence,  
20 Despite this promise that Steve made to you  
21 that someone would reach out to discuss,  
22 that nobody reached out to you.

23 Do you have any idea why that's  
24 the case?

25 A. No, I don't.

1 A. DELGADO

2 Q. Did something happen on  
3 December 22 of 2016?

4 A. Can you be more specific?

5 MR. BLUMETTI: I am going to mark  
6 an additional exhibit.

7 Q. Can you see these series of  
8 tweets?

9 A. Yes.

10 (Whereupon, a series of Tweets was  
11 marked Defendant's Exhibit S for  
12 identification as of this date by the  
13 reporter.)

14 Q. I would like to mark this as  
15 Defendant's Exhibit S. This document  
16 purports to be certain tweets that were  
17 posted to your Twitter account, although the  
18 specific date of the tweets is not set forth  
19 on these documents, I am going to represent  
20 that these tweets were posted on  
21 December 22.

22 Do you dispute that date?

23 A. No, but I would like you to  
24 clarify at what time.

25 Q. Actually, I don't have the time.

1 A. DELGADO

2 I just have that it is December 22, 2016.

3 Do you dispute that you posted  
4 these tweets on that date?

5 A. The date sounds accurate. The  
6 reason the time is relevant, is because at  
7 one point you sued me for claiming that I  
8 had disclosed that he would be Comms  
9 director when that was not disclosed. But  
10 it had been by ABC News two hours earlier.  
11 That's why I asked you for it, but maybe at  
12 some point you could get the copy as to the  
13 time.

14 Q. Do you have any understanding of  
15 the time of the tweets, whether it was  
16 morning, afternoon?

17 A. No, because there is four, so I am  
18 not going to say.

19 Q. I see there were hours in between?

20 A. Yes.

21 Q. Any idea of the time of the first  
22 tweet, whether it was the morning, afternoon  
23 or evening?

24 A. I think afternoon.

25 Q. Directing your attention to the

1 A. DELGADO

2 first tweet at the top it says,  
3 "Congratulations to the baby-daddy on being  
4 named White House Comms director."

5 Would this tweet have been posed  
6 by you shortly after the news broke that  
7 Jason was slated to be the Comms director?

8 A. It was like two to three hours  
9 later.

10 Q. The third tweet says, "The 2016  
11 version of John Edwards."

12 And the fourth tweet says, "So an  
13 announcement forthcoming concerning the new  
14 Comms director @Jason Miller in DC tonight."

15 Why did you refer to Jason as the  
16 baby-daddy in the top two? What were you  
17 trying to communicate?

18 A. I was trying to raise a flag and  
19 voice my belief that I was being  
20 discriminated against due to the pregnancy.  
21 And that was a -- I suppose what I  
22 considered some sort of clever way to convey  
23 that.

24 Q. When you say the baby-daddy, were  
25 you trying to convey that he was in fact the

1 A. DELGADO

2 father of your child, as opposed to just a  
3 father of any child?

4 A. No, yes, right, right mine, that's  
5 accurate.

6 Q. When you referred to Jason as the  
7 2016 version of John Edwards, what were you  
8 trying to communicate there?

9 MR. PHILLIPS: Object to the form.

10 A. What I was trying to communicate  
11 with the tweet?

12 Q. What was the point you were trying  
13 to make?

14 MR. PHILLIPS: Object to form.

15 A. The same thing, alerting that he  
16 was being nominated or appointed to a role,  
17 I was not, I was pregnant, the same as John  
18 Edwards had gotten his mistress pregnant.

19 Q. In posting these tweets, were you  
20 implying that Jason was involved in some  
21 sort of extra-marital affair?

22 A. No, it was more about I am  
23 pregnant.

24 Q. Then why refer to John Edwards?

25 A. Because it was also due to an

1 A. DELGADO

2 extra-marital affair, lots of people had  
3 extra-marital affairs, I would have chosen  
4 Bill Clinton if that was the case. The  
5 point of choosing John Edwards was because I  
6 am pregnant.

7 Q. In the fourth tweet, what  
8 announcement regarding Jason did you believe  
9 would be forthcoming?

10 A. I don't recall. I think I maybe  
11 was going to speak with more detail as to  
12 what I was experiencing is what I would  
13 speculate that I meant there.

14 Q. I am just trying to put this in  
15 chronological context, when we talked about  
16 earlier that you spoke to Steve on the  
17 morning of December 22, that someone would  
18 reach out to you and nobody did, why did you  
19 post these tweets that same day?

20 A. Steve will literally e-mail back,  
21 the entire time I have known him or call me  
22 back, within seconds. He didn't. It became  
23 obvious to me, not even I will call you  
24 later, I am busy now, I will call you later.  
25 It became obvious to me he was not going to

1 A. DELGADO

2 reach out.

3 Q. That same day to you it already  
4 became obvious?

5 A. Yes, these things move quickly.

6 Q. So before you posted these series  
7 of tweets on December 22, did anyone  
8 specifically tell you that you were no  
9 longer eligible --

10 THE WITNESS: I am sorry, hold on  
11 a second, Mr. Blumetti. What you said  
12 somehow turned on my Siri, it thought  
13 it was asking you a question, on my  
14 laptop. I am sorry, carry on.

15 MR. BLUMETTI: That's a modern day  
16 issue.

17 THE WITNESS: Right.

18 Q. Before you posted these series of  
19 tweets on December 22, did anyone  
20 specifically tell you that you would no  
21 longer be eligible for a position at the  
22 White House?

23 A. No, no one specifically told me  
24 that. I think it was communicated by  
25 Miller's appointment, given that Miller had



1 A. DELGADO

2 said that we both couldn't be in the White  
3 House.

4 MR. BLUMETTI: I would like to  
5 mark this as Defendant's Exhibit T.

6 (Whereupon, an Series of e-mail  
7 Bates stamped P3 to P4 was marked  
8 Defendant's Exhibit T for  
9 identification as of this date by the  
10 reporter.)

11 Q. It purports to be an e-mail or  
12 series of e-mails that you sent to different  
13 individuals. The bottom one is from  
14 December 23 of '16 that you sent to Steve  
15 Bannon and Reince Preibus. The top e-mail  
16 is the one that you sent the next day on the  
17 24th to Sean spicer, the Bates stamp is P3  
18 to P4.

19 Do you recognize these e-mails?

20 A. I produce them and they have the  
21 Bates stamp, sure.

22 Q. Directing your attention to the  
23 third paragraph, you wrote that Miller has  
24 known about the pregnancy since a few days  
25 before Thanksgiving.

1 A. DELGADO

2 Does that refresh your  
3 recollection as to when you told Jason that  
4 you were pregnant?

5 A. I thought it was like the night  
6 before. But this is probably more accurate.  
7 It was definitely like just before  
8 Thanksgiving.

9 Q. In the fourth paragraph, you  
10 wrote, "Since the affair and pregnancy could  
11 embarrass the Campaign/Team/Miller, et  
12 cetera, I repeatedly asked Miller to be sure  
13 to inform you all of this, so you could have  
14 the full information regarding to whom to  
15 give the Comms director role."

16 Did you post your tweets on  
17 December 22 knowing that they could  
18 embarrass the Campaign, the team and/or  
19 Jason?

20 MR. PHILLIPS: Objection to form.

21 A. When you say knowing, I dispute  
22 that they did embarrass the Campaign, and  
23 that certainly was not my intent. I was  
24 just voicing my belief that I was being  
25 discriminated against. And I have a little

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A. DELGADO

baby in my stomach that I need to provide  
for. So I was just voicing what was going  
on.

Q. But it's fair to say that your  
tweets didn't reference discrimination, when  
you referenced baby-daddy, John Edwards,  
were you using those words purposely to  
embarrass the Campaign or Miller?

MR. PHILLIPS: Objection.

A. I disagree. I think they are  
directly referencing discrimination, because  
I am pointing out that he has just been  
appointed Comms director. So that is solely  
my intent in posting those tweets. The  
Campaign had a tough skin when it came to  
embarrassment. When Hope Hicks had a  
shouting match with Corey in the middle of  
the New York street and Page 6 reported on  
it, no one seemed to mind that.

So I find it odd that they  
subsequently said that this embarrassed  
them. The truth shouldn't be embarrassing.

Q. Further down in the fourth  
paragraph, you wrote that Jason had told you

1 A. DELGADO

2 that Steve and Reince knew about your  
3 pregnancy, but it actually turned out that  
4 they did not know.

5 How did you know on December 23,  
6 that Steve and Reince were not aware of your  
7 pregnancy, did they tell you that?

8 A. I don't recall.

9 Q. That might have been a bit  
10 jumbled, I was just trying to characterize  
11 what you wrote here.

12 A. I believe at some point -- what is  
13 your question again, sorry?

14 Q. I know, that's why I wanted to  
15 highlight it for you.

16 How did you know on December 23 of  
17 '16 that Steve and Reince as it turned out  
18 were not aware of your pregnancy?

19 A. They were. I am mistaken here.  
20 They were aware.

21 Q. When did Steve and Reince find out  
22 about your pregnancy?

23 A. Well, we know Steve knew because  
24 of the e-mail I sent to him.

25 Q. The day prior?

1 A. DELGADO

2 A. Right.

3 Q. Or two days prior?

4 A. Right, which he then forwards to  
5 Miller. And I believe Reince was referenced  
6 somewhere, that that was when he had the  
7 conversation with Miller about when they  
8 met. And Miller said I am going to patch  
9 everything up.

10 Q. Who told you that Reince had  
11 apparently said this is 2016 and no one will  
12 care?

13 A. Miller told me that.

14 Q. And then he said in the next  
15 sentence, I do not believe that conversation  
16 ever even took place.

17 What made you believe Reince never  
18 made that comment after all?

19 A. I do believe that conversation  
20 took place. I think I was trying to be --  
21 that's the problem with reading e-mails  
22 years later. I think in that moment, as you  
23 see, this e-mail is being sent to Reince. I  
24 am trying to be diplomatic. Kind of like  
25 when you know someone has done something

1 A. DELGADO

2 bad, and you are like, I know that's not  
3 you, I know you didn't do that. That's why  
4 I put in there like, I know you didn't say  
5 that, even though I know he did. But since  
6 this e-mail is being sent to him, I am  
7 trying to give him some wiggle room.

8 Q. So is it your testimony that you  
9 believe that Reince did in fact say that it  
10 is 2016, and no one will care?

11 A. Yes, I believe Reince knew about  
12 the pregnancy. And I believe Jason at that  
13 point told them the jig was up.

14 I mean, was that referencing the  
15 affair? I am speculating, was it  
16 referencing the affair, the pregnancy? I  
17 don't know, I was not there. So I can't --  
18 you would have to ask Reince.

19 Q. On the second page, it says, "In  
20 the past few days, however, I have  
21 apparently as punishment for an affair  
22 started by a supervisor and as punishment  
23 for a pregnancy have been removed from the  
24 org chart and been removed from any job  
25 responsibility at least from any job

1 A. DELGADO

2 adequate for someone with my resume and  
3 experience."

4 What is your factual basis for  
5 asserting that you were punished for an  
6 affair and pregnancy?

7 A. Just as it says right there, I  
8 didn't receive the job that has been  
9 promised to me multiple times and my job  
10 that I was obviously on track for.

11 Q. How do you know that your name was  
12 removed?

13 A. Because Miller was suddenly being  
14 very evasive about showing me the org chart  
15 despite previously having told me in  
16 writing, you are on the org chart, you are  
17 going in, exclamation point. Another  
18 e-mail, I have spoken to Reince on the  
19 plane, he says everyone from Comms is going  
20 in.

21 Q. Did you ever see an org chart with  
22 your name on it?

23 A. Yes, at some point Miller was  
24 drawing it on his board.

25 Q. A physical drawing in person?

1 A. DELGADO

2 A. Yes, and he also showed me one  
3 that was printed out.

4 Q. Have you ever seen an org chart  
5 that did not have your name?

6 A. No. It was a belief I had that I  
7 had been removed from it.

8 Q. Assuming your belief is true, do  
9 you know when your name was removed from the  
10 org chart?

11 A. I don't know.

12 Q. Do you know the reasons why your  
13 name was removed from the org chart?

14 A. Are you saying it was?

15 Q. I am asking you do you know the  
16 reason why your name was removed from the  
17 org chart?

18 A. Do I know why? No, of course I  
19 don't. I have my belief why, as far as  
20 reasons, I don't.

21 Q. I understand your belief, trust  
22 me. I am asking if you have any factual  
23 basis to support the reasons why your name  
24 may or may not have been removed from the  
25 org chart?



1 A. DELGADO

2 MR. PHILLIPS: Objection to form.

3 A. Say that again.

4 Q. I believe you have already  
5 answered it.

6 To the extent that your name was  
7 removed from the org chart, did your tweets  
8 on December 22 or 24 have anything to do  
9 with it?

10 A. I don't know.

11 I hope not, because that would be  
12 removing someone from an org chart for  
13 complaining about discrimination. So I hope  
14 not.

15 Q. Did Steve or Reince respond to  
16 this e-mail?

17 A. I have produced everything I have,  
18 so you know better than I, you have the  
19 production in front of you. I don't recall  
20 if they did.

21 MR. BLUMETTI: Let's mark this I  
22 believe Defendant's Exhibit U.

23 (Whereupon, a one-page document of  
24 tweets was marked Defendant's Exhibit U  
25 for identification as of this date by

1 A. DELGADO

2 the reporter.)

3 Q. It is a one-page document, another  
4 series of tweets. Again, the specific date  
5 is not set forth, but I am going to  
6 represent that these tweets were posted on  
7 December 24 of '16.

8 Does that sound correct to you?

9 A. Yes.

10 Q. Did you write each of these three  
11 tweets?

12 A. It looks accurate.

13 Q. In the top tweet you wrote, "Jason  
14 Miller. Who needed to resign ...  
15 yesterday."

16 Who is Sean PMCD, whose handle is  
17 that?

18 A. That's Sean McDonald, he is a law  
19 school classmate of mine. As you could see,  
20 it is a reply. He was asking me who I was  
21 talking about in the baby-daddy tweet, and I  
22 answered.

23 Q. In the second tweet, "When people  
24 need to resign graciously and refuse to, it  
25 is a bit ... spooky."

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A. DELGADO

Why did you post these additional tweets on the 24th?

A. Continuing to call attention to what is going on.

Q. And the same question I asked similar to the December 22 tweets, did anyone tell you specifically before you posted these additional tweets that you would no longer be considered for a position in the White House?

A. Not explicitly, but by Jason's appointment that is what was being told, not explicitly but implicitly.

Q. Did Jason ultimately resign from the White House Comms director role?

A. Only after these tweets.

Q. On which day?

A. I don't recall.

Q. Would it refresh your recollection if I told you that he resigned on December 24, the same day as these second set of tweets?

A. No, because I am guessing you are going off of when it was announced. We

1 A. DELGADO

2 don't really know when or what -- I don't  
3 know.

4 Q. Do you know when the announcement  
5 was made that he was resigning?

6 A. I don't recall. But we could both  
7 Google that, I am sure.

8 Q. Did your December 22 and  
9 December 24 tweets get any attention in the  
10 media?

11 A. Attention in media, all tweets  
12 about the Trump Campaign get attention.

13 Q. Were any articles written about  
14 these tweets?

15 A. Articles were going to be written  
16 anyway, because I was kind of, also kind of  
17 getting ahead of a storm. On December 21,  
18 before I posted any tweet, Alex Isenstadt of  
19 Politico had contacted both Miller and  
20 myself that he had received a tip that  
21 Miller and were having an affair and he was  
22 going to write about it.

23 Q. So are you characterizing your  
24 tweets on the 22nd and 24th as bringing your  
25 attention to a complaint as you said or to

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A. DELGADO

get ahead of a negative press story?

A. No, no, no. This attention was going to happen anyways is what I was trying to convey to you with Alex Isenstadt. My tweets were my story and my raising a flag and giving myself a voice with all the discrimination I felt that was going on.

Q. Were these tweets the topic of any news segments on television, did you see any?

A. I don't have cable TV.

Q. The media attention that was garnered by way of these tweets, was it positive or negative?

MR. PHILLIPS: Object to form.

A. I don't know how to answer that. You would have to ask the people who have received it.

Q. Did you ever see or read any articles at all about the tweets that you posted?

A. I don't recall.

Q. Would you characterize these tweets as impulsive?

1 A. DELGADO

2 A. Absolutely not, no. I had been  
3 pregnant for four weeks.

4 Q. How would you characterize them?

5 A. It is a mother voicing a concern  
6 and raising a flag who is a little bit  
7 afraid about what is going on and feels  
8 there is a little bit of an injustice going  
9 on here, soon to be mother, which is a scary  
10 position to be in.

11 THE WITNESS: I am going to slide  
12 my table over a little bit, because I  
13 want to connect the battery. So I  
14 don't suddenly disappear.

15 THE VIDEOGRAPHER: We are off the  
16 record. The time is 2:56 eastern time.

17 (Whereupon, a short recess was  
18 taken.)

19 THE VIDEOGRAPHER: We are back on  
20 the record. The time is 3:05 p.m.  
21 eastern time.

22 MR. BLUMETTI: Corey indicated  
23 that we have been on the record for  
24 four hours and 28 minutes. Just as an  
25 update. We are still well on the same

1 A. DELGADO

2 pace.

3 I am going to share my screen,  
4 Ms. Delgado and show you an e-mail. We  
5 could call this Defendant's Exhibit v.

6 (Whereupon, an e-mail Bates  
7 stamped DEf 1297 was marked Defendant's  
8 Exhibit V for identification as of this  
9 date by the reporter.)

10 A. An e-mail that you sent to Jason  
11 on 11/12/16, Subject: So done.

12 It reads "I am so fucking done  
13 already, seriously."

14 Having read this e-mail, do you  
15 know what is going on here, what you were  
16 talking about?

17 A. No, it seems I was upset about a  
18 Washington Post article.

19 Q. Do you have any idea what that  
20 Washington Post article had said?

21 A. It seemed like it had -- I don't  
22 know, it had mentioned others.

23 Q. Not you?

24 A. I am not sure, I don't know. I  
25 would have to look at the article, I don't

1 A. DELGADO

2 know.

3 Q. When you wrote, "Press sec for me  
4 is laughable, but that wasn't the point of  
5 this article," are you referring to press  
6 secretary?

7 A. Probably.

8 Q. Did you mean that you would not or  
9 should not have been considered for the role  
10 of press secretary?

11 A. I don't know what I mean. I would  
12 have to read the article.

13 Q. Okay. But seeing where it says,  
14 "Press sec for me it laughable," as you sit  
15 here today, do you have any idea what you  
16 meant by that?

17 A. I could certainly tell you that it  
18 didn't mean that that would be a laughable  
19 position for me to have. I am more  
20 qualified than every single person that has  
21 served as press secretary in the White House  
22 in the Trump administration. So that's  
23 certainly not what it meant. I don't what  
24 it did mean.

25 Q. At the bottom of the e-mail, you



1 A. DELGADO

2 wrote, "If I go on an angry tweet storm, you  
3 will know why."

4 What did you mean by that  
5 sentence?

6 A. That was an inside joke Miller and  
7 I had. Somebody had gone on like a  
8 Twitter -- what is the word? Not storm, but  
9 rant, I forgot who, from the Campaign or the  
10 RNC. And we used to go back and forth, if I  
11 go on an angry tweet storm, obviously I  
12 didn't, so that's what that was about. It  
13 is an inside joke reference.

14 Q. When you said, "Enjoy DC," period,  
15 was this a positive e-mail to Jason, or a  
16 negative one?

17 A. It just signs off. I guess he was  
18 going home, doing something in DC, enjoy DC  
19 is what it says.

20 Q. I want to go back to your amended  
21 complaint, paragraph 43, you speak about the  
22 tweets that we talked about before.

23 In paragraph 44, you say, "On  
24 December 26 of '16, Ms. Delgado spoke with  
25 Spicer on the phone. He discouraged

1 A. DELGADO

2 Ms. Delgado from pursuing White House  
3 employment due to her status as a pregnant  
4 woman and a first-time mother."

5 Did Sean ever work for the  
6 Campaign?

7 A. No, he work for the RNC, I think.

8 Q. Why did you speak to Sean on the  
9 phone on December 26?

10 A. Sean was going to be part of the  
11 Comms Group in the White House, and they  
12 asked him to call me.

13 Q. So he called you?

14 A. I think. I am not sure. He was  
15 appointed at some point to speak to me.

16 Q. Where were you physically when you  
17 spoke to Sean? Were you in Florida or New  
18 York?

19 A. I can't recall.

20 Q. Was there anyone on that phone  
21 call aside from you and Sean?

22 A. I guess Sean would be able to  
23 answer that more than me.

24 Q. Through your knowledge?

25 A. Through my knowledge, no.

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A. DELGADO

Q. What was the sum and substance of the purpose of the phone conversation with Sean on December 26?

A. When we drafted this, we looked through what we produced as far as text and e-mails. For me just off the top of my head to tell you what the December 26 conversation was, I would be speculating. There are several conversations.

Q. So more to the substance, you essentially allege that Sean tried to discourage you from pursuing a position in the White House, is that fair?

A. Yes.

Q. Do you recall any specific comments that Sean made to you?

A. I list them there in 45.

It was very clear that he said, simply the quote was, the White House is no place for a new mom. Trust me, you don't want to do this, it is hard enough, I would not to be able to work in -- I think he said he had worked in the White House before, and he would not be able to do it if it weren't

1 A. DELGADO

2 for the fact that he and his wife have a  
3 nanny or nannies. That's the only reason I  
4 know Sean has a nanny, because he  
5 specifically said that.

6 What he also said, which I have  
7 subsequently learned is not true, that they  
8 would meet every day at 6:00 a.m. -- at 7:00  
9 a.m. including on weekends. And he was  
10 like, how would you do that as a mom, how  
11 would you do that as a first-time mom? You  
12 are going to be frazzled.

13 So those are a few. There are  
14 probably more. But those are the ones that  
15 I have committed to memory at this point.

16 Q. What did you say in response to  
17 these comments?

18 A. I was just like okay, ah-ha,  
19 ah-ha. I didn't even know how to react.  
20 Okay, but I think I could do it, Sean, yeah,  
21 I got you, but I could do it. It was  
22 awkward.

23 Q. You said these are the comments  
24 that you have committed to memory. As you  
25 sit here today, do you have any notion of

1 A. DELGADO

2 any other similar comments that Sean made to  
3 you in and around this time?

4 A. The one that is seared in my brain  
5 is that the White House is no place for a  
6 new mom, the 7:00 a.m., the nanny comment, I  
7 am trying to think. I know there are a few  
8 others, but they are just not coming to mind  
9 right now.

10 Q. How about the time frame of these  
11 comments, were they all in and around this  
12 December 26 phone call?

13 A. I think they were like -- like I  
14 said, we went over the texts and also my  
15 recollection based on the texts and the  
16 e-mails. So I also had conversations with  
17 him in January. But the tone was the same  
18 in all. Some of the remarks were repeated  
19 in subsequent calls in January. It was  
20 constant discouraging me from the White  
21 House role, trying to make it sound as this  
22 is for your benefit, you won't want to do  
23 this.

24 Q. How about prior to Sean being made  
25 aware that you were pregnant, did he ever

1 A. DELGADO

2 make any gender-based comments to you at  
3 that point or was it all pertaining to this?

4 A. No, I had little interaction with  
5 him.

6 Q. Were you insulted by Sean's  
7 comments to you?

8 A. Insulted is not the word.

9 Q. What is the word?

10 MR. PHILLIPS: Same objection.

11 THE WITNESS: I am sorry, what was  
12 the objection? I can't hear.

13 MR. PHILLIPS: I just said  
14 objection.

15 THE WITNESS: Oh, okay.

16 A. Frightening, dread, frightening,  
17 because without any doubt I was being pushed  
18 out of the White House role. And I am  
19 listening to this and I am pregnant. It was  
20 frightening.

21 Q. Did you tell him that?

22 A. No, because I don't want to scare  
23 them off. It is kind of a tiptoeing, I feel  
24 like I have to tiptoe. I don't want to be  
25 argue and I don't want to be difficult. I

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A. DELGADO

just kept insisting, sure, okay, I see what you are saying, but no, really, I want the White House role. I just kept softly insisting and coming back to the White House role, come back to the White House role.

Q. During any of your communications with Sean in around this time, late December of '16, early January of '17, did either of you raise the topic of your tweets?

A. No, Sean never said, to my recollection, Sean never said there was any problem with the tweets.

Q. Did you ever raise Sean's comments to you with any other people at work, whether it be Steve, Kellyanne, anybody?

A. No, because he was kind of the point person. So there was no one. He was the one that was kind of like handling this, so there was no one to go to at that point around him or above him on this.

And I was trying to be at diplomatic as possible and discrete.

Q. Circling back to what you produce, the e-mail P3 and P4, the December 24

1 A. DELGADO

2 e-mail. You said in the first sentence,  
3 "Sean, as I did not have a chance to  
4 emphasize this on our brief call yesterday."

5 You pleaded in the complaint that  
6 your phone conversation happened on  
7 December 26. Did you also have a call with  
8 him on December 23?

9 A. I mean, it appears to from this  
10 e-mail, if that date is correct. I don't  
11 know how brief, it does say it is a brief  
12 call. It could have literally have been  
13 just we will talk another time.

14 Q. Do you recall how many total phone  
15 calls you have with Sean in or around this  
16 week, the two-week period?

17 A. I don't.

18 Q. Was it more or less than five?

19 A. I don't recall.

20 MR. BLUMETTI: Let's mark this as  
21 Defendant's Exhibit W.

22 (Whereupon, a e-mail Bates stamped  
23 DEF 1542 to 1543 was marked Defendant's  
24 Exhibit W for identification as of this  
25 date by the reporter.)



1 A. DELGADO

2 Q. Bates stamp 1542 to 1543. This  
3 document purports to be certain e-mail mails  
4 that you sent to different individuals. The  
5 bottom one is from December 29 of '16. The  
6 top one is from January 6 of '17.

7 Do you recognize these e-mails?

8 A. If these are plaintiff's exhibits?

9 Q. They are not, these are actually  
10 defendant's exhibits?

11 A. Then I have no way to know whether  
12 I recognize them, but I will trust that they  
13 are accurate.

14 Q. Well, this is your Campaign e-mail  
15 address, ajdelgado@donaldtrump.com?

16 A. Yes.

17 Q. Do you recall sending e-mails to  
18 Don McGahn, Reince, Sean and Rick Dearborn  
19 at this time?

20 A. I don't. But I trust if you guys  
21 have this on your end. I don't recall this.

22 Q. Following your conversation that  
23 we talked about with Sean on December 26,  
24 did you speak to any other individuals aside  
25 from Sean regarding either your pregnancy or

1 A. DELGADO

2 your pursuit of a position at the White  
3 House before you sent this e-mail? Do you  
4 recall any other conversations?

5 A. I don't recall.

6 Q. What prompted you to send this  
7 e-mail now to Don McGahn, legal counsel,  
8 along with Reince, Sean and Rick Dearborn?

9 A. I would not know why I included  
10 Don and Rick, I don't recall.

11 Q. Do you recall what prompted you to  
12 send the e-mail at all?

13 A. It sounds like I am still  
14 concerned, lingering concerns for lack of  
15 the job.

16 Q. I am going to represent that Jason  
17 announced his resignation from the White  
18 House Comms director role on December 24.  
19 So five days before you sent this e-mail.

20 Do you know whether Jason was  
21 working for either the Campaign or the  
22 Transition team as of December 29?

23 A. I don't know.

24 Q. Directing your attention to the  
25 second page, it says, "Mr. Miller has acted

1 A. DELGADO

2 in a scary manner towards me previously.  
3 Once when I was home for Thanksgiving and  
4 didn't answer his calls for a couple of days  
5 during which he called and texted me  
6 incessantly, he later revealed to me during  
7 that time, he had an investigator friend of  
8 his find my home address in case."

9 Do you see that paragraph?

10 A. Yes, I had forgotten that, yes.

11 Q. Is this the first time that you  
12 made any kind of complaint regarding  
13 Mr. Miller's conduct towards you?

14 A. I don't recall.

15 Q. Do you recall raising the notion  
16 that he acted, quote, in a scary manner  
17 towards you, prior to this e-mail?

18 A. I don't recall.

19 Q. Do you recall whether you told any  
20 individuals at work regarding this  
21 Thanksgiving incident prior to this e-mail?

22 A. Did I tell anyone about the  
23 Thanksgiving incident? I don't recall,  
24 sorry.

25 Q. In any of these e-mails that we

1 A. DELGADO

2 are looking at, did you ever tell anyone,  
3 whether at the Campaign or the Transition or  
4 even legal counsel, that Jason had sexually  
5 assaulted you in Las Vegas a couple of  
6 months earlier?

7 A. I think you asked me that earlier  
8 when we were talking about it. I don't  
9 believe I did tell anyone. I don't believe  
10 any good would have come of talking to  
11 anyone.

12 Q. I am directing your attention to  
13 the top e-mail, to the January 6 one, you  
14 wrote, "I have heard nothing from the  
15 Campaign in six days, despite Sean Spicer's  
16 assurances that I was not being penalized  
17 and that I would be taken care of personally  
18 and professionally."

19 When did Sean provide you with  
20 these assurances?

21 A. According to this e-mail, some  
22 time in December.

23 Q. Would it have been during the  
24 phone calls that we discussed a few minutes  
25 ago?

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A. DELGADO

A. I don't recall exactly if it was phone call or otherwise.

Q. Do you recall what Sean said to you about, quote, not being penalized?

A. I am sorry what he said? He said I was not going to be penalized.

Q. You said "despite Sean Spicer's assurances that I was not being penalized." What exactly did he say to you about not being penalized, what was the context of that comment?

A. I wish I could recall, I don't recall. I could speculate, but I shouldn't speculate.

Q. What did you mean in the second paragraph when you wrote, "It seems the Campaign is penalizing me for having a, quote, affair."

What exactly was the Campaign doing to penalize you?

A. Well, it is January 6 and I still don't have my White House job.

Q. But which specific Campaign workers were penalizing you?

1 A. DELGADO

2 MR. PHILLIPS: Object to form.

3 A. Which workers from the Campaign?

4 Q. Correct. I believe we said before  
5 that Reince and Sean never worked for the  
6 Campaign.

7 So I am just trying to understand  
8 how is the Campaign penalizing you?

9 A. Well, it is not solely the  
10 Campaign that is penalizing me. I am  
11 referencing the Campaign here, because I am  
12 e-mailing Rick Dearborn who is with the  
13 Campaign. I am not saying exclusively the  
14 Campaign.

15 Q. Do you know of any specific  
16 Campaign workers, people that worked for the  
17 Campaign that were, quote, penalizing you  
18 for having an affair?

19 A. The Campaign itself.

20 Q. The Campaign is a legal entity. I  
21 am not saying that they would not be or not  
22 be responsible for the conduct of  
23 individuals working for it. I am asking can  
24 you attribute the conduct to a specific  
25 person?

1 A. DELGADO

2 A. It is various.

3 Q. Any names come to mind?

4 A. I am sorry, you are asking me  
5 which of the workers did what?

6 Q. I am just reading your e-mail  
7 here, Ms. Delgado, in the second paragraph  
8 it says, "It seems that the Campaign is  
9 penalizing me for an affair."

10 I am just asking you whether any  
11 specific individuals that you recall were  
12 penalizing you for that affair?

13 A. Well, Steve was part of the  
14 Campaign.

15 Q. Okay?

16 A. Jason Miller is part of the  
17 Campaign.

18 Q. Okay?

19 A. And although they were not  
20 official employees, Reince and Sean  
21 certainly, it all kind of meddled together  
22 with the Campaign, especially in the  
23 post-election period.

24 Q. What is your basis for asserting  
25 that Reince penalized you for having an

1 A. DELGADO

2 affair?

3 A. Well, I am not sticking -- it is  
4 not exclusively an affair. It is also the  
5 pregnancy resulting from that affair. So  
6 that's kind of just shorthand.

7 Q. So what did Reince do to penalize  
8 you for having an affair and/or being  
9 pregnant?

10 A. No White House job.

11 Q. And you attribute that to Reince  
12 specifically?

13 A. Not exclusively.

14 Q. Who else do you attribute that to?

15 A. Stephen Bannon, Sean Spicer.

16 Q. I don't mean to belabor the point,  
17 Ms. Delgado, I just want to understand, what  
18 specific conduct did Reince do that lead you  
19 to be no longer in consideration of a White  
20 House role?

21 A. I think I answered that question  
22 already.

23 Q. With respect to Reince?

24 A. Yes. He was the person partly  
25 deciding who would receive a White House



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A. DELGADO

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job.

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Q. Are you aware of any affirmative or even inaction on his part pertaining specifically to you?

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A. Well, he informed Miller, we have an e-mail from Miller, where Miller says, I was on the plane with Reince, and Reince says everyone from the Comms shop is going in. That's Miller during the Campaign saying Reince is the one calling the shots as to who goes in. And then I didn't go in from the Comms shop. So I think it is very clear there that he was the one, perhaps not the only one, making those calls. It is in writing.

17

18

19

Q. Do you know specifically whether Reince, in fact, made the decisions of who went in or who didn't go in?

20

21

22

23

A. I don't know for sure if he made those decisions. It would be highly unlikely that he did not, given that he was Chief of Staff, I believe.

24

25

Q. Do you know specifically whether Steve Bannon was responsible for making

1 A. DELGADO

2 decisions of who went in and who didn't go  
3 in?

4 A. Yes, because I remember reading  
5 reports and hearing from various  
6 individuals, Steve got me a role.

7 Q. Steve got who a role?

8 A. Various individuals who Steve  
9 obtained a job in the White House for.

10 Q. Let me ask you a different way, do  
11 you know whether Steve would have been  
12 responsible for making the decision about  
13 whether you personally was going to be  
14 getting a role or not?

15 A. I don't know that.

16 Q. The same question for Sean Spicer?

17 MR. PHILLIPS: The same objection.

18 A. I don't see how I would know that  
19 for certain.

20 Q. An the same question for Reince?

21 MR. PHILLIPS: Objection.

22 A. The same answer.

23 Q. Who is Rick Dearborn?

24 A. I don't remember now.

25 Q. Do you recall what his position

1 A. DELGADO

2 was?

3 A. I don't, I might be speculating so  
4 far.

5 Q. Do you recall interacting at all  
6 with Rick during your time working for the  
7 Campaign?

8 A. I don't believe so.

9 Q. Do you know whether Rick worked  
10 for the Transition?

11 A. I don't recall.

12 Q. Do you know or are you alleging  
13 that Rick ever made any discriminatory or  
14 derogatory comments to you, gender based,  
15 pregnancy based?

16 A. Not that I recall.

17 Q. In the third paragraph of this  
18 e-mail to Rick and Sean, you said, "I am  
19 reactivating my Twitter account tomorrow and  
20 will be calling for Hope Hick's  
21 resignation."

22 When did you deactivate your  
23 Twitter account?

24 A. Why did I deactivate it?

25 Q. When, I am going to also ask you

1 A. DELGADO

2 why?

3 A. When did I deactivate, I realized  
4 due to my being pregnant, I wanted as a  
5 little stress as possible. Given that as a  
6 Trump supporter, your feed is always full of  
7 hate, especially once we won, I needed to  
8 think of the baby, so I deactivated Twitter.

9 Q. So you made that decision under  
10 your own volition?

11 A. I guess you could say that.

12 Q. Did your decision to deactivate  
13 your Twitter account have anything to do  
14 with the tweets you posted on the 22nd and  
15 the 24th.

16 MR. PHILLIPS: Objection.

17 A. I would not be able to answer  
18 that, because I don't know to what degree  
19 those were causing my mentions.

20 Q. Causing your what, I am sorry?

21 A. Causing my mentions to be more  
22 active or not. I don't know to what extent.  
23 I can't extrapolate. So just looking out  
24 for the pregnancy really.

25 Q. Which position did you believe

1 A. DELGADO

2 Hope should have resigned from?

3 A. Oh, she had been appointed, I  
4 think Comms director -- no, I am sorry, she  
5 was appointed some sort of like strategical  
6 Comms adviser, I am not even sure.

7 Q. Why did you believe that Hope  
8 should have resigned?

9 A. Because I remember someone in the  
10 org had said, oh, no, no, it is not that you  
11 are pregnant, it is that you had an affair.  
12 I said, well, if it is an affair, how come  
13 Hope who had an affair with Corey who was a  
14 married father with four kids hadn't had to  
15 resign. You can't have it both ways.  
16 Either admit it is the pregnancy, or if you  
17 claim it is the affair, then Hope also  
18 should not have a White House job. So  
19 that's what I was alluding to there. And I  
20 did not in fact reactivate or call for her  
21 resignation, for the record.

22 MR. BLUMETTI: This is Defendant's  
23 Exhibit X.

24 (Whereupon, an e-mail Bates  
25 stamped DEF 1986 to 1990 was marked

1 A. DELGADO

2 Defendant's Exhibit X for  
3 identification as of this date by the  
4 reporter.)

5 MR. BLUMETTI: It is a five-page  
6 document certain e-mails Bates stamped  
7 DEF 1986 to DEF 1990. The document  
8 purports to contain certain e-mails  
9 that you exchanged with an individual,  
10 Eric Dreiband.

11 Q. Who is Eric Dreiband?

12 A. I think at some point he  
13 introduced himself and said the Campaign had  
14 appointed him, which is interesting, because  
15 it was the Campaign who did it, no one else,  
16 the Campaign had hired me -- had him to  
17 handle my concerns.

18 Q. Do you know whether he was counsel  
19 to the Campaign or the Transition team or  
20 both?

21 A. I identified himself as counsel  
22 for the Campaign, I believe.

23 Q. On page 4 of this PDF, that's an  
24 e-mail from you to Eric Dreiband on  
25 January 6 of '17.

1 A. DELGADO

2 What prompted you to send an  
3 e-mail to Eric Dreiband on January 6? The  
4 reason I ask it appears to be the first  
5 e-mail in the chain, to reach out to him?

6 A. I didn't say he reached out to me.  
7 He introduced himself, we spoke on the  
8 phone.

9 It says Sean Spicer, this gives us  
10 the information we need, informed me that he  
11 would have you reach out to me, as the Trump  
12 team had brought you on as reinsurance to me  
13 of how serious we are taking this.

14 Q. In the third paragraph you wrote,  
15 "Sean had been very reassuring regarding the  
16 team's alleged concerns about my situation,  
17 including my pregnancy and assured on  
18 multiple occasions that a job was guaranteed  
19 to me, including working on one option that  
20 would allow me to work from home out of  
21 Florida."

22 What conversation did you have  
23 with Sean from a job working from home?

24 A. Sure, so since Trump kept -- I am  
25 sorry, not Trump, since Sean kept insisting

1 A. DELGADO

2 on that whole White House, White House isn't  
3 for you. He kept suggesting what about a  
4 job in Miami where you will have your mom  
5 nearby. And so what I was doing to not  
6 ruffle feathers, because the situation was  
7 so delicate, I didn't trust that I could be  
8 fully transparent, I was kind of just going  
9 along with yes, I will think about that too,  
10 Sean, but White House, really, really should  
11 be White House, that's really my preference,  
12 but I will think about what you said. It is  
13 what we Cubans call (Inaudible Spanish  
14 phrase) a Spanish phrase, following  
15 someone's current, to keep things even when  
16 you don't agree. That is kind of what I was  
17 doing, indulging someone, sure, I will think  
18 about the Miami option. That's what I meant  
19 there.

20 Q. Did you ever ask Sean whether it  
21 was possible for you to work from home out  
22 of the White House?

23 A. I don't understand the question,  
24 work from home out of the White House?

25 Q. Right, work from home while being



1 A. DELGADO

2 employed at the White House, did you ever  
3 ask anybody?

4 A. If that's something he brought up.  
5 I don't think that is something I would have  
6 brought up, because that doesn't sound  
7 feasible.

8 Q. That's why I am asking you, did  
9 you ever ask him that?

10 A. I don't recall that. That doesn't  
11 sound feasible to me, so I don't recall  
12 doing so. It sounds odd.

13 It is possible in the discussions  
14 he might have said that, I don't know.

15 Q. I am just directing your attention  
16 to the first page of the e-mail that Eric  
17 Dreiband sent to you on January 22. He  
18 wrote, "A.J., thanks for returning my  
19 message. I look forward to speaking with  
20 you. I am outside counsel for the Trump  
21 Campaign and Transition."

22 Does that refresh your  
23 recollection as to who he was counsel to?

24 A. Yes, Trump Campaign and  
25 Transition, but Trump Campaign.

1 A. DELGADO

2 Q. Understood, Eric had said, "I hope  
3 to speak with you about alleged  
4 discrimination."

5 Did you ever end up speaking to  
6 Eric on the phone?

7 A. I think we did once or twice. And  
8 that where I get the idea also, he always  
9 just said like counsel for the Campaign.  
10 But I think we did talk once or twice.

11 Q. Do you recall when? Was it in  
12 January?

13 A. It would have been this time  
14 frame, like late January, early February, I  
15 don't recall.

16 Q. Do you recall the sum and  
17 substance of your conversations with Eric  
18 Dreiband?

19 A. Yes. He was very -- I don't know  
20 if I am allowed to say, because I don't know  
21 if it was a settlement communication or not.  
22 I don't want to violate any -- am I allowed  
23 to because he was representing you guys?

24 Q. Well, I am just asking you about  
25 the alleged discrimination really.

1 A. DELGADO

2 A. What is your question, what we  
3 talked about?

4 Q. Did you ever speak to Eric about  
5 alleged discrimination?

6 A. Did I speak to him on the phone  
7 about alleged discrimination?

8 Q. Did you ever give him your version  
9 of events or your side of the story?

10 A. I might have, I don't recall.

11 Q. Did you ever speak to any other  
12 lawyers at Jones Day regarding allegations  
13 of discrimination?

14 A. Possibly.

15 Q. Do you recall the names of any  
16 individuals?

17 A. No.

18 Q. Do you know whether any lawyers at  
19 Jones Day spoke to any other individuals  
20 regarding your allegations?

21 A. No, I don't.

22 Q. Looking back at your first amended  
23 complaint, chronologically speaking, you  
24 reference the phone calls or call with Sean  
25 in December. Then it says in paragraph 47,

1 A. DELGADO

2 "Shortly thereafter, the Campaign and  
3 Transition, including Spicer, Bannon and  
4 Preibus, stripped Ms. Delgado of her job  
5 responsibilities and duties for the  
6 remainder of her employment with them from  
7 late December 2016 through the inauguration  
8 in late January 2017."

9 What exactly did Sean do to strip  
10 you of your job responsibilities?

11 A. So Sean at that point was kind of  
12 the De facto head of Comms, because he was  
13 going to be incoming -- he had already  
14 announced his incoming press secretary. And  
15 I was suddenly given absolutely nothing to  
16 do.

17 Q. Was it your understanding that  
18 Sean would provide you with your punch list  
19 of work?

20 A. I would not call it with a punch  
21 list, but some work. Surely we were busy  
22 enough.

23 Q. Do you know whether Sean was  
24 directing the work of other individuals on  
25 the Comms teams?

1 A. DELGADO

2 A. Yes, there were directives coming  
3 down from him, just not to me. I do recall  
4 hearing of those.

5 Q. Do you know whether he was  
6 purposely leaving you out of those  
7 conversations?

8 A. I believe he clearly was. I mean,  
9 you have four people who were the highly  
10 recognizable faces of the Trump Campaign and  
11 you suddenly forget about one of them.

12 Q. I understand that you are drawing  
13 an inference from the inaction. But did  
14 Sean ever tell you that you were not getting  
15 any job responsibilities at that time?

16 MR. PHILLIPS: Objection.

17 A. Not that I recall. I don't recall  
18 if he did or not.

19 Q. Did any other individuals at that  
20 time tell you that you were not going to be  
21 getting any more work at that time?

22 A. Not that I recall.

23 Q. The same questions for Steve, you  
24 say that Steve Bannon stripped of your job  
25 responsibilities. What exactly did he say?

1 A. DELGADO

2 A. The same answer. Somebody that  
3 used to rely on me all the times for ideas  
4 and talking points suddenly went completely  
5 cold.

6 Q. And I understand you are drawing  
7 an inference from inaction or silence or  
8 ghosting so to speak, did Steve ever tell  
9 you that you are no longer getting any job  
10 duties or tasks?

11 MR. PHILLIPS: Objection.

12 A. Not that I recall.

13 Q. When you said that Sean was the De  
14 facto head of Comms, what was Steve doing at  
15 that time? Was he involved in Comms?

16 A. What was Steve doing? Steve was  
17 never really Comms. He was more policy, but  
18 he would always get -- for instance, the  
19 national Hispanic stuff, I would mostly  
20 report to him, not to Jason on that. That  
21 was more like outreach. Steve had kind of  
22 like an umbrella role which was not Comms  
23 per se which I also filled.

24 Q. The same question for Reince, what  
25 exactly did Reince Preibus do to strip you

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A. DELGADO

of your job responsibilities?

A. Nothing overt that to my knowledge that I can recall.

Q. In paragraph 49 you said that you were excluded from participating in communications work of the inauguration in any capacity, even though she was still formally part of the communications Transition team.

Who excluded you?

A. The Campaign. You would know better than I who was in charge of that.

Q. I am asking you, can you ascribe that conduct to a particular human who excluded you?

A. All three of those individuals that you mentioned earlier, Spicer, Bannon and Preibus, were in top roles having to do with the inauguration, especially Sean with Comms. Because an inauguration is such a Comms heavy event, you have top people doing media hits in the days leading up, et cetera. I received absolutely no word at all, not even an invitation to the

1 A. DELGADO

2 inauguration.

3 Similarly there was a big Hispanic  
4 outreach event at the White House, that  
5 would have fallen under Bannon's umbrella.  
6 Certainly Reince would have had something to  
7 do with that too as Chief and Staff. And  
8 the RNC has always been big on outreach to  
9 various communities. Not only was I not  
10 consulted about that, I was not invited to  
11 it even.

12 Q. I certainly understand your  
13 testimony that you are drawing an inference  
14 from inaction or silence, but did anyone  
15 tell that you were excluded?

16 MR. PHILLIPS: Objection.

17 A. No, that almost would have been  
18 too kind to tell me. It was just for me  
19 being pregnant on my laptop in my kitchen to  
20 figure out that I was not invited to  
21 inauguration. They didn't even have the  
22 decency to do what you are saying, flat out  
23 telling me.

24 Q. Who was responsible for sending  
25 out the invites for inauguration?



1 A. DELGADO

2 A. They certainly would have been  
3 able to dictate and likely were the  
4 individuals dictating who participates in  
5 the inauguration as far as, not event  
6 planning, but as far as Comms, outreach  
7 events to certain communities, like the  
8 Latino community, et cetera. Those would  
9 have been at their level.

10 Q. Do you know whether Sean, Reince  
11 or Steve directed anybody not to invite you  
12 to the inauguration?

13 A. Well, not explicitly, I don't know  
14 when or who exactly.

15 Q. Where were you physically located  
16 at this time, January of '17 in Florida?

17 A. Because I wasn't given any work, I  
18 think I was physically in Florida. But I  
19 still considered myself working out of New  
20 York.

21 Q. Did you travel at all to D.C. in  
22 either late December of '16 or January of  
23 '17?

24 A. No. So wait, late December, no, I  
25 don't think so, no. To D.C., no, I thought

1 A. DELGADO

2 you said New York, sorry.

3 Q. Paragraph 50, you said you were  
4 even prohibited from making previously  
5 scheduled television appearances around the  
6 time of the inauguration.

7 The same lines of questions,  
8 Ms. Delgado, I don't mean to belabor the  
9 point, but I am asking you who prohibited  
10 you?

11 A. That would have likely been Spicer  
12 who is now in charge of Comms.

13 Q. Do you know whether Spicer  
14 specifically told anybody that you were  
15 prohibited?

16 A. I don't know that. Only he knows  
17 that.

18 Q. In December or January of '17,  
19 December of '16 rather or January of '17,  
20 did you tell anyone that you would no longer  
21 be doing anything in media on behalf of the  
22 Campaign or Transition team?

23 A. I am sorry, when?

24 Q. At that time period of December  
25 '16, January '17, did you tell anyone that

1 A. DELGADO

2 you would not be doing anything in media on  
3 behalf of the Campaign or Transition team?

4 A. I think at one point I asked like  
5 let me know what is going on like before I  
6 do any more hits. And then the silence  
7 continued. I was trying to see what exactly  
8 is going on here. And I think I recall  
9 something vaguely like that, like what is  
10 going on? And I received no response.

11 Q. Would that have been before or  
12 after you disclosed to individuals at work  
13 that you were pregnant?

14 A. That would have been after Miller  
15 being appointed and all of that.

16 Q. You have used the word "hits" a  
17 few times today. Just for my own  
18 edification, what do you mean when you say  
19 "media hit"?

20 A. That's what we all call hits,  
21 that's what Jason called them, that's what  
22 the Campaign always called them. You need  
23 to go do a hit on Maddox. It is not a hit  
24 in a negative, it is an appearance, it is a  
25 short form for appearance.

1 A. DELGADO

2 Q. So any time I turn on the news and  
3 I see someone making an appearance, making  
4 an appearance on Cable news, that could be  
5 described as a hit?

6 A. Yes, he had a hit on -- now that  
7 you ask about it, it sounds negative. It is  
8 not considered a hit like you are going to  
9 go in there and wipe the floor with them.  
10 No, no, no, it is a hit, like a gig, a gig.  
11 That's just the term that Jason always used,  
12 I don't even ascribe it to Jason. I have  
13 just heard the team outside of him before  
14 him. At some point it went from gig to hit,  
15 and it just stuck.

16 Q. Who is Alexa Henning?

17 A. She was another one of Miller's  
18 people who he had brought over from  
19 Jamestown. She was the booker, she would  
20 book us on -- not always, not all bookings  
21 would go through her. But the network would  
22 contact her and be oh, we want so and so to  
23 come on or could you send us someone to do  
24 Chris Hayes tonight, et cetera. She was  
25 like an administrative assistant of sorts to

1 A. DELGADO

2 Jason.

3 MR. BLUMETTI: I am going to show  
4 you this one. We could mark it as  
5 Defendant's Exhibit Y.

6 (Whereupon, a one-page e-mail DEF  
7 842 was marked Defendant's Exhibit Y  
8 for identification as of this date by  
9 the reporter.)

10 MR. BLUMETTI: It is a one-page  
11 DEF 842. It looks like it is an e-mail  
12 from you to Alexa on December 16 of  
13 '16.

14 Q. My question is, on December 16 of  
15 '16, this was before you disclosed that you  
16 were pregnant, Alexa asked you, Hi, A.J.,  
17 please let me know if you have any time for  
18 anything this weekend. And to which you  
19 responded, thank you, Alexa, but I will no  
20 longer be doing anything in media for the  
21 team.

22 Why did you send that e-mail?

23 A. This was around the time that I  
24 just had a conversation with Jason again  
25 about how -- once again, he rephrased the

1 A. DELGADO

2 same and I don't want to put words in his  
3 mouth, it was not the same waddling around  
4 the White House pregnant, but it was a very  
5 similar sentiment. And so she sends me  
6 this, that's why I cc'd him, I didn't have  
7 to check to see if he is on there. I said  
8 okay, well, if there is no White House job,  
9 I am not doing media. He saw that and then  
10 called me and she called me. And then it  
11 was fine and they continued booking me. But  
12 it was right after, and that's why he was  
13 cc'd on that.

14 Q. You were not sending a message to  
15 Jason by sending this to his colleague?

16 A. I don't know if I was sending a  
17 message to him, but I was copying him,  
18 because he is the reason. He is telling me,  
19 hey, you are not going to be able to go into  
20 the White House. And then I got an e-mail  
21 from her saying, hey, come do the hits that  
22 are once again making you toxic in the legal  
23 community. So I reacted with, I am not  
24 going to do any more media, because my boss  
25 has just told me he is outsing me

1 A. DELGADO

2 effectively because of my pregnancy. But  
3 then he called me and she called me. And he  
4 tried to smooth it over. That's why he was  
5 cc'd on there.

6 Q. Did you tell any other media  
7 outlets that you would no longer be doing  
8 any media on behalf of the team aside from  
9 Alexa Henning?

10 A. No, not that I recall, not that I  
11 recall, no.

12 Q. Following the election on  
13 November 8 of '16, and aside from those  
14 comments that you have attributed to Jason  
15 and Sean, whether it be the waddling comment  
16 or the discouragement comments from Sean,  
17 did any other individuals at work make any  
18 comments to you that you believed were  
19 gender based or pregnancy based?

20 A. Gender or pregnancy based?

21 Q. Both.

22 A. I think I already answered the  
23 gender comments.

24 Q. And I believe you said no?

25 A. No, I said like about Boris'

1 A. DELGADO

2 remarks.

3 Q. So this is following the election  
4 on November 8 of 2016?

5 A. Oh, following -- well, Boris'  
6 remarks was following the election. It was  
7 literally the day after we won.

8 Q. So we got that one too.

9 Any other comments?

10 A. We have been going for a while,  
11 excuse me, if I have to say this, not that I  
12 can recall at this time. I am sure after we  
13 end this, tomorrow I will think of something  
14 I missed, I apologize, I am doing my best.  
15 Not that I can recall at this point, other  
16 than the ones I already mentioned.

17 As far as pregnancy  
18 discrimination, to answer your question,  
19 other than Sean's comments, most people  
20 didn't know. So there wasn't really much  
21 room for any discriminatory, comment from  
22 any others.

23 Q. We are here for a little while, if  
24 you think of anything on the fly,  
25 Ms. Delgado, I encourage you to say so?



1 A. DELGADO

2 A. Thank you, but I am focused on  
3 your questions.

4 MR. BLUMETTI: Mark this as why.

5 (Whereupon, Plaintiff's Response  
6 and Objections to Defendant's First Set  
7 of Interrogatories was marked  
8 Defendant's Exhibit Z for  
9 identification as of this date by the  
10 reporter.)

11 Q. This is a ten-page document,  
12 Ms. Delgado. It purports to be your  
13 Response to Objections to Defendant's First  
14 Set of Interrogatories to you.

15 Turning to page 10 first, is that  
16 your signature?

17 A. Yes.

18 Q. Do you recall reviewing these  
19 Interrogatory Responses, or at least the  
20 substance of them, before they were served  
21 by your prior counsel?

22 A. No. We went over them on the  
23 phone while I was in a store with my son.  
24 So I didn't get a chance to review this  
25 before it was filed.

1 A. DELGADO

2 Q. Response to Interrogatory No. 9,  
3 you identified Jason Miller, Boris Epstein  
4 and Corey Lewandowski and Sean Spicer as  
5 having made discriminatory comments  
6 regarding your pregnancy.

7 I understand the comment that you  
8 attributed to Jason, I understand the  
9 comment that you attributed to Sean, which  
10 comments did Boris make regarding your  
11 pregnancy?

12 A. I think that might be a typo,  
13 because Interrogatory No. 9, I know it says  
14 here about her pregnancy colon, but I think  
15 that might be a typo, neither Boris or  
16 Corey. I apologize for that error, because  
17 I know my signature is on this. But I  
18 generally didn't have a chance to read  
19 through it carefully. It is probably an  
20 editing process mistake.

21 Yes, it goes straight into about  
22 her pregnancy, but the interrogatory is  
23 about sex, gender or pregnancy.

24 Q. Having seen this or understanding  
25 what you said about that perhaps it is a

1 A. DELGADO

2 mistake, can you think of any comments that  
3 Corey Lewandowski made regarding your  
4 pregnancy, sex or gender?

5 A. Yes, Corey was always making lude  
6 remarks, not just about me, but other women.  
7 The reason he didn't come to mind earlier, I  
8 guess because he left the Campaign in the  
9 early part of '16, it didn't come to mind.  
10 I was thinking to people in the war room.

11 Q. What lude remarks did Corey make  
12 regarding you?

13 A. A comment about my rear.

14 Q. Your buttocks?

15 A. Buttocks, I don't know how to say  
16 that, the rear.

17 Q. What exactly did he say to you  
18 about your rear?

19 A. It was like, I think he said, it  
20 was when we were doing, they take you out  
21 into the press hall after the debates, and  
22 they have those big Roman looking pillars  
23 with your name on them for the press to  
24 come. Corey came up to me when I was doing  
25 like a gaggle, and like it was in front of

1 A. DELGADO

2 other people, I wish I could tell you who  
3 saw it, but there were like a couple of  
4 reporters. I don't know if he was drunk and  
5 he slapped my ass, and he was like, nice  
6 ass, Delgado, which was just random, random.

7 Q. Did you make any complaints to  
8 anybody about that?

9 A. It is Corey.

10 Q. What do you mean by that when you  
11 say it is Corey?

12 A. Like I said, I don't like to  
13 complain. It is a one-time thing. I don't  
14 work directly with him. So we are in the  
15 middle of debates, I am not going to raise  
16 an issue.

17 Q. Anything else come to mind about  
18 Corey, comments or otherwise?

19 A. I know he had that issue with the  
20 reporter, Michelle, who like claims she hit  
21 him. But that was nothing to do with me per  
22 se. So that's not an example for your  
23 question, but that's what comes to mind.

24 Q. How about Boris, I believe Boris'  
25 name listed here was a mistake, is that

1 A. DELGADO

2 true?

3 A. I am sorry, what?

4 Q. I believe you said Boris listed in  
5 response to this particular question is a  
6 mistake?

7 A. About the pregnancy. It is not an  
8 error, because I see the interrogatory says  
9 sex, gender or pregnancy. The way my  
10 attorney wrote it where he limited it to  
11 about her pregnancy, is the error.

12 Q. I believe you described the  
13 comment Boris made regarding your accent  
14 before. Did he ever make any comments to  
15 you regarding your sex, gender?

16 A. Not a communication about my own.  
17 But like I said, the boorish, no pun  
18 intended with his name, but the boorish  
19 remarks that the men like Bryan Lanza, there  
20 was one other, I forgot the name, that they  
21 would make like about the women on TV. But  
22 if it is about me in particular, the accent  
23 is the one that sticks out.

24 Q. What position were you seeking to  
25 obtain in the White House?

1 A. DELGADO

2 A. I think I was open to considering  
3 various policy roles or Comms role.

4 Q. Were you seeking a position in the  
5 communications department or the press  
6 department or a different department?

7 A. Either of those, either, all of  
8 the above.

9 Q. What is the difference between the  
10 communications department and the press  
11 department?

12 A. That's a really good question that  
13 no one really seems to be able to answer. I  
14 think the general understanding is that the  
15 Press Department works more directly with  
16 the press, whereas Comms is more about  
17 drafting the administration's approach to  
18 messaging.

19 Q. To your knowledge, approximately  
20 how many people were slated to work in the  
21 Comms Department in the White House in the  
22 Trump administration?

23 A. I think about 25, but I am  
24 speculating.

25 Q. The same question for the Press

1 A. DELGADO

2 Department?

3 A. I think that one was broader, I  
4 shouldn't speculate on that one.

5 Q. Who is responsible for making the  
6 decision to hire persons to work in the  
7 communication department?

8 A. The Chief of Staff and the press  
9 secretary. Even though the press secretary,  
10 the Comms Department is considered  
11 ironically kind of like, at least at that  
12 time slightly subordinate to the press  
13 secretary.

14 Q. What is your factual basis for  
15 asserting that the press secretary and the  
16 Chief of Staff were responsible for making  
17 the decision to hire those, how do you know  
18 that?

19 MR. PHILLIPS: Object to the form.

20 A. Because of the individuals who  
21 were appointed. And they were literally  
22 being selected. It was literally Sean's  
23 people and Reince's people. You could  
24 literally see, Sean's assistant, Reince's  
25 assistant, there was a direct line, it is

1 A. DELGADO

2 their department. Reince is Chief of Staff,  
3 literally, Sean runs the Press and Comms  
4 Group, they are the bosses.

5 Q. Let me ask it in a different way.  
6 Did Sean and Reince make recommendations for  
7 persons to be hired that might have a  
8 correlation to who they know and work with,  
9 or did they make the actual decision?

10 A. I believe they made the actual  
11 decision, not just the recommendation. It  
12 is a recommendation that is going to be  
13 rubber stamped, so it is the same thing.

14 Q. And the same question for the  
15 Press Department, who would have been  
16 responsible for hiring those individuals?

17 A. Sean, Reince.

18 Q. And it is your testimony that they  
19 not only made recommendations, that they  
20 actually made the actual decision?

21 A. I don't even think they made  
22 recommendations. When I said it is a  
23 recommendation that will be rubber stamped,  
24 I meant it is not a recommendation. These  
25 are the people that I want, your own team.



1 A. DELGADO

2 Just like a war almost, you staff the people  
3 you want on your team, and that's it, you  
4 select them.

5 Q. I want to know how do you know  
6 that for sure? I understand that's your  
7 strong suspicion, but do you know for a fact  
8 that Sean and Reince was the one that made  
9 the decision?

10 A. That's how every White House  
11 works. This White House was no different.

12 Q. Again, I don't mean to be -- I  
13 just want to target to the fact that you  
14 know that for sure, that these two made the  
15 decision?

16 A. Yes, because there were literally  
17 reports saying Sean chose this person for  
18 this role, unless those reports were wrong,  
19 et cetera.

20 Q. Have you ever seen those reports?

21 A. Yes, I recall them all.

22 Q. To the extent an individual is  
23 hired to work in the Comms Department or  
24 Press Department in the White House, who is  
25 that individual's employer?

1 A. DELGADO

2 A. That's beyond my pay grade to  
3 know, I don't.

4 Just to be clear, it is when they  
5 are being hired, when they are hired? I  
6 don't understand.

7 Q. When they are hired, who is that  
8 individual's employer?

9 A. When they are actually working at  
10 the White House?

11 Q. Yes.

12 A. I suppose the White House, the  
13 government. But that's not who selects  
14 them. It is a unique situation.

15 Q. Who made the decision not to hire  
16 you to work in the White House?

17 A. The Campaign acted as a hiring  
18 agency for the White House. It was the  
19 Campaign and the individuals I mentioned.

20 Q. So it is your testimony that the  
21 Campaign entity itself made the decision not  
22 to hire you to work in the White House?

23 A. Well, it is as written in my  
24 complaint and the individuals named.

25 Q. So Sean Spicer made the decision

1 A. DELGADO

2 not to hire you to work in the White House?

3 A. I guess we will find out in his  
4 deposition, I believe so.

5 Q. I am just asking you what you  
6 know?

7 A. It is in my complaint.

8 Q. Right, I know, but a complaint is  
9 different than your deposition testimony  
10 under oath.

11 Did Reince Preibus make the  
12 decision not to hire you to work in the  
13 White House?

14 A. Yes.

15 Q. And how do you know that?

16 A. He is Chief of Staff.

17 Q. Did anyone ever tell you that  
18 Reince made the decision not to higher A.J.  
19 Delgado to work in the White House?

20 A. Not explicitly.

21 Q. Did anyone ever say to that to you  
22 about Sean Spicer?

23 A. Sean Spicer himself explained that  
24 clearly.

25 Q. He explicitly said that he made

1 A. DELGADO

2 the decision not to hire you to work in the  
3 White House?

4 A. Not explicitly, but when you are  
5 telling me it won't work out because I am a  
6 new mom, it is pretty obvious.

7 Q. Did a certain individual interfere  
8 with your ability to obtain a position in  
9 the White House?

10 A. I don't know that. A certain  
11 individual, I don't understand your  
12 question, I don't know that. Did a certain  
13 individual?

14 Q. That's what I am asking you, are  
15 you aware of any specific individual who did  
16 anything to interfere with your ability to  
17 obtain a position in the White House?

18 MR. PHILLIPS: Objection.

19 A. Other than the individuals that we  
20 have discussed for the past few minutes?

21 Q. Right.

22 A. Other than Sean, Reince, Steve,  
23 not to my knowledge. I would love to know  
24 if so, but not to my knowledge.

25 Q. What exactly did Sean do to

1 A. DELGADO

2 interfere with your ability to obtain a  
3 position?

4 A. What did Sean do to interfere? He  
5 doesn't need to interfere, because he is the  
6 decision maker.

7 Q. That's what I was getting at.  
8 When you say the same individuals, to your  
9 knowledge, did anyone interfere, a  
10 third-party, with your ability to obtain a  
11 position in the White House?

12 MR. PHILLIPS: Objection.

13 A. I don't know how I would know  
14 that. I don't know that.

15 I would think that is something  
16 that you would have produced in your  
17 discovery, if there is such a third-party.

18 Q. I want to take a look at your  
19 amended complaint, paragraphs 54 and 55.

20 It says, "Defendants prevented  
21 Ms. Delgado from obtaining employment in the  
22 White House and Federal Government,  
23 interfering with her relationship with  
24 governmental third parties, including the  
25 United States of America, the White House,

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A. DELGADO

the General Services Administration, the Executive Office of the President and/or the Office of Management and Budget, who would have otherwise have hired Ms. Delgado, because of her sex, gender and pregnancy and because she complained of discrimination."

Which of the defendants in this lawsuit communicated with the governmental third-party and advised it not to hire you?

MR. PHILLIPS: Objection.

A. I don't understand your question. I am getting really confused, sorry.

Q. Let me take a look at 55.

"In particular, upon information and belief, in late 2016 or early 2017, defendants communicated with the Federal Government, including but not limited to, the same, the USA, the General Services Administration, the Office of the President, and advised the Trump administration or the Federal Government to remove Ms. Delgado from the list of incoming White House personnel and not to hire her."

Which of the individuals in this

1 A. DELGADO

2 lawsuit communicated with the Federal  
3 Government and told them not to hire you?

4 MR. PHILLIPS: Objection.

5 A. I don't understand.

6 Q. In your pleading you are referring  
7 to defendants, we have the Campaign entity,  
8 the Transition team entity, Sean Spicer,  
9 Reince Preibus and Steve Bannon, you are  
10 saying one of them or all of them  
11 communicated with the Federal Government.  
12 How do you know that?

13 A. I am sorry if I sound really  
14 stupid --

15 Q. Not at all, I am trying to  
16 understand. You refer to specific  
17 communication, I am trying to understand  
18 what communication you are referring to?

19 MR. PHILLIPS: Objection. That's  
20 what the complaint said, not what the  
21 client said.

22 A. Sorry, I don't know.

23 Q. Are you aware of any specific  
24 communications between any of the defendants  
25 in this lawsuit and the Federal Government

1 A. DELGADO

2 saying not to hire A.J. Delgado to work in  
3 the White House?

4 A. I don't have that information, I  
5 don't have access to that information.

6 Q. Going back to your Interrogatory  
7 responses on page 6. In response to 15 and  
8 16, we asked you and your counsel to  
9 identify any documents containing  
10 communications between the Campaign and any  
11 third-party concerning any prospective  
12 employment of plaintiff with the Federal  
13 Government.

14 You responded that you are not  
15 aware of any responsive documents.

16 Is that true and accurate?

17 A. Right, I don't know where those  
18 documents are or what they say.

19 Q. Do you know whether any documents  
20 exist?

21 A. I have no way of knowing that for  
22 sure.

23 Q. In response to Interrogatory No.  
24 14, we asked, identify each person who  
25 communicated with the Federal Government, I



1 A. DELGADO

2 was asking you before, and told it not to  
3 hire you. You identify Sean Spicer, Steven  
4 Bannon, Reince Preibus, Jason Miller, Donald  
5 J. Trump and Jared Kushner.

6 How do you know that any one of  
7 these individuals communicated with the  
8 Federal Government and advised them not to  
9 hire you?

10 A. Well, aren't these answers on  
11 information and belief?

12 Q. They are not, that's why I am  
13 asking you?

14 A. Well --

15 Q. Do you have any basis to say under  
16 oath that any of these individuals  
17 communicated with the Federal Government and  
18 directed it not to hire you?

19 MR. PHILLIPS: Objection.

20 A. Can I see paragraph 55 again?

21 Q. Sure.

22 A. You see paragraph 55 says, upon  
23 information and belief. Now flip back to  
24 the interrogatory, it says as alleged in  
25 paragraph 55, upon information and belief.

1 A. DELGADO

2 I am answering this, it is upon information  
3 and belief, this interrogatory.

4 Q. Okay.

5 A. Okay, thank you.

6 Q. Do you know for sure one way or  
7 another?

8 MR. PHILLIPS: Objection.

9 A. That's impossible to know for sure  
10 I don't know my own name for sure.

11 Q. In response to Interrogatory No.  
12 13, you are asked, "Identify each person  
13 with knowledge or information concerning the  
14 facts and circumstances on which the  
15 plaintiff bases her allegation that  
16 defendants prevented you from obtaining  
17 employment with the White House and Federal  
18 Government as alleged in paragraph 54."

19 We will go back to paragraph 54.

20 Paragraph 54 is not alleged upon  
21 information and belief?

22 A. Can you flip back to the  
23 interrogatory.

24 Q. You identified Sean Spicer, Steve  
25 Bannon, Reince Preibus, Jason Miller, Donald

1 A. DELGADO

2 J. Trump, Jared Kushner, Bradley Parscale,  
3 Eric Trump, Donald Trump, Jr., Ivanka Trump,  
4 and Michael Glassner?

5 A. I am going to voice an objection  
6 that this was vague and ambiguous, so I  
7 answered to the best I could.

8 Q. I am asking you yes or no, do you  
9 know for sure whether any of these  
10 individuals did anything specific to prevent  
11 you from obtaining employment in the White  
12 House?

13 MR. PHILLIPS: Objection.

14 A. It would be presumptive to say  
15 1,000 percent for sure.

16 Q. Is it fair to say that you don't  
17 know for sure whether these individuals did  
18 anything specific to prevent you from  
19 working in the White House?

20 MR. PHILLIPS: Objection.

21 A. I don't know their summonings are  
22 1,000 percent for sure.

23 Q. Let's talk about those first.  
24 What name are you 1,000 percent sure that  
25 did something to prevent you from working in

1 A. DELGADO

2 the White House?

3 A. Spicer, Bannon, Reince Preibus,  
4 Jason Miller, and the rest are more upon  
5 information and belief.

6 Q. The first four individuals you  
7 named, that's for the reasons you have  
8 already given; correct?

9 A. In part.

10 Q. Anything else that comes to mind  
11 that makes you 100 percent or 1,000 percent  
12 sure that Sean Spicer, Steve Bannon, Reince  
13 Preibus and Jason Miller did anything to  
14 prevent you from obtaining employment in the  
15 White House?

16 MR. PHILLIPS: Objection.

17 A. I would not be able to answer that  
18 with certainty.

19 Q. We touched on this issue a few  
20 times earlier, briefly.

21 The work in the Comms Department  
22 or Press Department at the White House, do  
23 applicants for employment, to your  
24 knowledge, have to pass a background check?

25 A. So you don't apply for employment,

1 A. DELGADO

2 you are just offered a job. There is no  
3 such thing as an opening that you submit an  
4 application for. If you want to rephrase  
5 it.

6 Q. Do applicants who are offered a  
7 position of employment in the White House  
8 have to pass a background check?

9 A. I am going to answer do  
10 appointees, people offered a job, not  
11 applicants, have to pass a background check?  
12 No. While that's technically the policy,  
13 they apparently do not, because there were  
14 over three dozen individuals working in the  
15 White House, including in the West Wing, who  
16 did not pass the background check, yet were  
17 permitted to work in the White House  
18 nonetheless.

19 Q. Let's scroll down on some  
20 specifics. Do you know whether Sarah  
21 Sanders passed or failed a background check?

22 A. I don't know.

23 Q. Do you know whether Omarosa Newman  
24 passed or failed a background check?

25 A. I don't know.

1 A. DELGADO

2 Q. Do you know whether Boris Epshteyn  
3 passed or failed a background check?

4 A. I don't know. But he shouldn't  
5 have, because he had an arrest for assault  
6 and battery on his record prior to the  
7 Campaign, yet he was allowed to work in the  
8 West Wing.

9 Q. How do you know that he had a  
10 record prior to working for the Campaign?

11 A. It is public record. I could  
12 provide it to you.

13 Q. When did you first become aware of  
14 that?

15 A. We knew about it on the Campaign.

16 Q. Who first told you?

17 A. I can't recall who told me, I  
18 can't recall. But there was talk of it.

19 Q. I believe you referred to an  
20 individual a few times named Rob Porter, who  
21 is Rob Porter?

22 A. So Rob is an individual who worked  
23 in the West Wing who had a domestic violence  
24 restraining order from a couple of years  
25 earlier. And he had two ex-wives, one who

1 A. DELGADO

2 had obtained the domestic violence  
3 restraining order, unlike mine, it was not  
4 over e-mails, it was for actual battery,  
5 physical abuse. Another ex-wife of his also  
6 alleged and had alleged and had gone to the  
7 FBI saying she had been abused. And a third  
8 woman, an ex-girlfriend of his, also went to  
9 the FBI saying that she had been abused.  
10 Despite all of this Mr. Porter was allowed  
11 serve not only in the White House, but in  
12 the West Wing, handling every single  
13 document, including top secret documents,  
14 that Donald Trump signs.

15 Q. Do you know whether Mr. Porter  
16 disclosed these prior incidents on his SB 86  
17 or 87?

18 A. I don't know, I would like to see  
19 a copy of it. But I know Trump claimed to  
20 not be aware prior.

21 Q. Do you know whether Boris Epshteyn  
22 disclosed on his SB 86 or 87, whether he  
23 disclosed the prior battery arrests to which  
24 you referred?

25 A. I don't know. I am sure he

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1 A. DELGADO

2 disclosed it, just as I would have disclosed  
3 mine --

4 Q. Do you know that one way or  
5 another for sure, that's my question?

6 A. No, I have never seen his SB 86,  
7 how would I know that?

8 Q. I understand you identified  
9 certain people who should have failed the  
10 background check, but still got a position.  
11 Are you aware of any appointees who did not  
12 obtain employment or were not offered a  
13 position because they failed a background  
14 check?

15 A. The only ones I heard of were very  
16 low level people who were kind of getting a  
17 job like through the grapevine, through like  
18 someone of someone. Susie Wiles, who was a  
19 latecomer to Trumpism, a late appointee to  
20 like run Florida, her daughter was then  
21 given a job, because the daughter of someone  
22 who helped out in Florida, very tangential.  
23 And she didn't pass due to like admitted  
24 substance abuse, but they just gave her a  
25 job elsewhere in the administration.



## 1 A. DELGADO

2 So the only people for whom it  
3 appeared to be a problem were very junior  
4 people or people who were getting a job  
5 through like a friend of a friend and hadn't  
6 actually worked on the Campaign. I have a  
7 longer list than just Rob Porter. There is  
8 Freddy Klein, there is John McEntee. There  
9 is Stephanie Grisham who had two DUIs, two  
10 mugshots, had been fired from two jobs for  
11 financial fraud. There is Max Miller.  
12 There is a long list of people who had  
13 criminal records, unlike mine, mine was a  
14 civil restraining order of just a no contact  
15 about e-mails. These were criminal records,  
16 and they were allowed to be in the White  
17 House no problem.

18 One distinction is they are all  
19 white and I am not. So it is curious that  
20 the Campaign keeps coming back to the issue  
21 that you had a restraining order. It is  
22 almost like you saying it would have been a  
23 problem for you, but it was not a problem  
24 for any of these other people, none of whom  
25 were Latino, so.

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A. DELGADO

Q. Do you know whether any of these individuals disclosed any of these prior arrests or convictions on their SB 86 or 87?

A. I trust they did, just as I would have.

Q. But do you know one way or the other?

A. I don't have a copy of their SB 86 or 87.

Q. Anyone aside from Susie Wiles' daughter come to mind that ultimately did not get a position in the White House or West Wing because they did in fact fail a background check?

A. There was an article at one point that named like four people. They were all very young, very junior, hadn't worked on the Campaign. So it is not something that would be surprising.

MR. PHILLIPS: Was that Katie Wiles, K-A-T-I-E, for the record?

THE WITNESS: Yes, I think it was K-A-T-I-E was her name, Susie Wiles' daughter. And she was a sweet girl. I

1 A. DELGADO

2 certainly don't mean to disparage her  
3 in any way. And Susie is a nice person  
4 too. I really liked Susie and worked  
5 well with her.

6 Q. What positions did the individuals  
7 that you referenced -- where did Freddy  
8 Klein work in the White House?

9 A. Freddy Klein, that one escapes me.  
10 I know that there was an article that read,  
11 despite long rap sheet person gets White  
12 House clearance anyway. So I have to find  
13 that article. I am sure it said what  
14 position he had.

15 Rob porter had an extremely high  
16 level position.

17 Stephanie Grisham, she was lower  
18 than me on the Campaign, her job was to  
19 wrangle the reporters behind the rope or  
20 designated area. She was Comms director for  
21 Melania and then became Comms director for  
22 the whole White House and press secretary,  
23 despite two DUIs, mugshots, criminal record.

24 And you were saying the positions,  
25 okay, so Boris had a very high level

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2 position in the West Wing. I forgot,  
3 something to do with policy, I believe. And  
4 I forgot the other names that I mentioned to  
5 you.

6 I know max Miller also had a  
7 pretty -- he had like an assault criminal  
8 record. And I know he had a fairly high  
9 level position, also West Wing.

10 And the other names are escaping  
11 me now.

12 Q. Do you know who made the decision  
13 to hire Freddy Klein to work in the White  
14 House?

15 A. I do not.

16 Q. The same question for Stephanie  
17 Grisham?

18 A. Stephanie, since she was in the  
19 Comms Group, I would think and so high, and  
20 heading up Comms for Melania, I think Reince  
21 would have to approve that if not outright  
22 appoint that. But I think it would have  
23 more likely been Sean, because she did Press  
24 on the Campaign and Sean did Press, so it  
25 all melts together, that's like his group.

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2 Q. How about Max Miller?

3 A. I don't know who would have  
4 appointed him.

5 Q. How about Rob Porter?

6 A. I don't know.

7 Q. How about Boris Epshteyn?

8 A. That would have been like the  
9 same, similar to me, because he did Comms.  
10 So probably Sean.

11 Q. Do you know who made the decision  
12 not to offer Katie Wiles a position at the  
13 White House?

14 A. No one high ranking, because she  
15 was so junior. So I don't think that came  
16 across anybody's desk.

17 Q. Are you currently employed?

18 A. I am not.

19 Q. When was the last time that you  
20 were employed?

21 A. April 30, 2018 when I was received  
22 an e-mail out of the blue from the PAC, from  
23 the America First PAC, which I had joined,  
24 saying we are going in a different  
25 direction, no severance. My health

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2 insurance ended that day, and my son had a  
3 doctor's appointment on Monday that I had to  
4 cancel, because I wouldn't sign a release  
5 saying I would let the Campaign out of this,  
6 these claims of liability. So the PAC fired  
7 me. So it was April 30 of 2018.

8 And recently, after years and  
9 years of job applications, which I am happy  
10 to provide you a list I have where I have  
11 applied, the date, the name of the position,  
12 the company or entity, et cetera, over 200  
13 job applications.

14 I finally got a job I hoped with  
15 the VA as an attorney for remote work. And  
16 because Mr. Miller doesn't pay for  
17 childcare, Mr. Miller who is currently  
18 running the Campaign, I had to leave the  
19 job, I couldn't do it. I immediately fell  
20 behind. I was only able to do the training  
21 for three months, it was a five-month  
22 training. I couldn't even complete the  
23 training.

24 Q. During which time did you work for  
25 the VA?

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2 A. I want to say my start date was  
3 November 6, and I was so excited to have a  
4 job again. And the lack of childcare just  
5 made it impossible, beyond impossible. My  
6 son would literally come into Zooms and say  
7 hi on the screen. Given his autism, it is  
8 hard to say mommy is -- you know, so it has  
9 been hard. Nobody wants to hire me, because  
10 you look me up, it is all Trump, Trump,  
11 Trump.

12 I had three great interviews with  
13 an in-house position with Seattle University  
14 like two years ago, and I was so excited.  
15 And the interviews were great. And the  
16 minute they looked me up, it is like --

17 I also had an interview recently  
18 with December with the City of Rochester to  
19 be an attorney for them. And literally in  
20 the interview they asked me, did you ever  
21 work for the Trump Campaign. And I said  
22 yes. And they said, don't you consider that  
23 something that might be embarrassing to the  
24 City? I literally had to get up and say  
25 thank you for your time. If we ever run

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2 into each other, please say hello, it has  
3 been a pleasure chatting with you. At least  
4 they were honest.

5 Q. What was your position at the VA?

6 A. It was going to be an attorney  
7 position.

8 Q. And did you draw a salary or were  
9 you paid hourly?

10 A. It was going to be a salaried  
11 position. It paid \$60,000 a year. It was  
12 the best I could find.

13 Q. Did you in fact earn that salary  
14 for any period of time?

15 A. Only, they do pay you for the  
16 training. So I cleared about 4,000 a month  
17 for those three months.

18 Q. And then around January or  
19 February of this year, did you resign, was  
20 your employment terminated or something  
21 else?

22 A. No, I had to explain to them, and  
23 they were really nice about it, like  
24 everybody knew, I am too behind guys. And  
25 they understood with the lack -- it is in



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2 writing, they said if you ever want to  
3 reapply when you get your childcare sorted  
4 out, let us know.

5 Q. So you resigned?

6 A. Yes, I had to. I was just too  
7 behind. It is not fair. I am ethical and  
8 if I am behind in a job, it is not right to  
9 collect a salary. I was lost.

10 Q. Circling back to your  
11 interrogatory responses, in response to 21,  
12 identify each person with whom plaintiff was  
13 employed in any manner from January '17 to  
14 the present.

15 You identified, as you said  
16 before, America First Policies, Inc. and  
17 your current job at the VA which you no  
18 longer have?

19 A. Right.

20 Q. You have had no other jobs over  
21 the last six and a half years aside from  
22 those two?

23 A. No. And like I said, it is not  
24 for a lack of trying. I have worked every  
25 angle, every contact, every application I

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2 could remotely qualify for.

3 The Trump administration Surgeon  
4 General, he was a former Surgeon General,  
5 recently gave an interview a few months ago  
6 saying what a hard time he has had finding  
7 work, because people just don't want be to  
8 be associated, whether that's fair or not,  
9 with someone who has the Trump toxicity  
10 associated with them. You have 50 other  
11 applicants, why are you going to go with me?

12 Q. During which period of time did  
13 you work at America First?

14 A. It was January 1, 2018 to  
15 April 30, 2018.

16 Q. Was that a remote job?

17 A. Yes.

18 Q. What was your position?

19 A. Adviser.

20 Q. What were your duties and  
21 responsibilities?

22 A. They were kind of vague about  
23 that. It became really clear it was kind of  
24 like the same hush money job they had  
25 offered Omarosa. No offense, I don't mean

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2 that to be accusatory. I am just stating my  
3 honest -- because I wasn't really kind of  
4 told what my duties would be, it was like  
5 well, what do you want to do, okay, yeah,  
6 that sounds great. If you want to go do  
7 hits, hits on Chris Hayes, that's great or  
8 help out with some talking points. It was  
9 strange. Like I was just here is a little  
10 job and stay quiet and be nice type of job.

11 Q. How much money did you earn in  
12 America First?

13 A. In total only \$60,000, because it  
14 was only four months. And it was  
15 \$15,000 per month. And within like two  
16 weeks or so of my joining is when Eric Trump  
17 sent me the e-mail saying, oh, Larry Rosen,  
18 your partner, just reminded me that there is  
19 this little issue, that lawsuit you might  
20 file against the Campaign still lurking, so  
21 we are going to need you to sign a release.  
22 I said with all due respect, I currently  
23 have no plans to sign that, but I don't see  
24 why I would sign that, no disrespect.  
25 Things are -- let's just move forward. And

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2 he said, I am very disappointed to hear  
3 that, very ominous. And then sure enough,  
4 within 90 days after the retaliation is  
5 presumed time period ends, like literally  
6 like a few days later, I am told you are  
7 out, no reason given, no severance.

8 Q. My next couple of questions was,  
9 was your employment terminated?

10 A. Yes. I am sorry if I got ahead of  
11 you.

12 Q. Were you provided with a reason  
13 for the termination of your employment?

14 A. A very basic that we have decided  
15 to go in a different direction. I  
16 immediately wrote back Bryan Walsh who was  
17 running the PAC, I said what are you talking  
18 about? I have been sitting here doing  
19 whatever I can, I have been a team player,  
20 where is this coming from, what is the  
21 reason? And he wouldn't answer.

22 Q. Did you engage in any conduct that  
23 could have given rise to the decision to  
24 terminate your employment?

25 A. No, certainly none that was

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brought to my attention. Everything was quiet, it was quiet and going well.

Q. What is your basis for saying that your discussion or refusal to sign a, quote, release had any bearing on the termination of your employment with American First?

A. What is my basis for that?

Q. Correct, I understand it is an assumption, I am saying do you know that for sure?

A. I know Walsh himself had asked me a while later, how come you didn't sign the release that Eric had asked you about? And I found it kind of odd that Eric had mentioned it to him even. So that's when it was also clear that this was also like a formal problem. So that's part of the basis as well as the time of it. They waited until I started at the PAC to throw that on me. And then literally, and I learned that later, it was 90 days in New York, you would know this better than I, is the period in which you assume retaliatory action. It is almost as if an attorney said hey, wait for

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2 the 90 days and then fire her. And that's  
3 almost like to the day when I was hired.

4 Q. Did Bryan Walsh ever tell you that  
5 was the reason that your employment was  
6 terminated, because of your refusal to sign  
7 a release or he just asked you why you  
8 didn't sign the release?

9 A. At the time he told me why didn't  
10 you sign the release, he had not terminated  
11 me. So I am not sure how to answer your  
12 question.

13 Q. I am asking you did anyone ever  
14 tell you that your employment with America  
15 First was terminated because you didn't sign  
16 a release?

17 A. No, but I don't think anyone would  
18 be stupid enough to say that. That's  
19 literally like admitting fault.

20 Q. When you refer to retaliation, who  
21 are you saying was retaliating against you  
22 at that time when you were working for  
23 America First?

24 A. So I consider Eric Trump an agent  
25 of the Campaign. And Eric was even approved

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2 by the Campaign to try to work out a deal  
3 between us the previous fall.

4 So your question was who was? I  
5 want to make sure.

6 Q. You have answered it, you say  
7 through the conduct that you attribute to  
8 Eric, you are attributing that retaliatory  
9 conduct you said to the Campaign?

10 A. Yes, there is no hiding, I don't  
11 think they dispute that he was acting as an  
12 agent of the Campaign. He was hey, you need  
13 to sign this for us, for us, the Campaign.  
14 The Campaign is not supposed to work in  
15 tandem or coordinate with the PAC. So I was  
16 really kind of taken aback by that.

17 Q. I believe you referenced earlier  
18 that you were general counsel to ALPFA. Why  
19 didn't you disclose ALPFA in response to  
20 Interrogatory No. 21?

21 A. Did we not? That's just an  
22 oversight then. My attorney, they probably  
23 said like what started, they probably  
24 thought it was like starting from January of  
25 2017. And I went back to ALPFA for a good

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2 chunk of that 2017 year. So that's just an  
3 oversight. I apologize. Because I see --  
4 yes, that should have been listed.

5 Q. When did you stop working at  
6 ALPFA?

7 A. So I went back after the Campaign,  
8 especially I needed health insurance due to  
9 the baby. So it was through -- I think I  
10 did it through the end of 2017. And then  
11 January 15 I officially moved over to the  
12 PAC.

13 Q. You mentioned before that you  
14 applied to numerous jobs over the prior four  
15 to six years. Have you produced all the job  
16 applications that you have in your  
17 possession?

18 A. I don't have job applications in  
19 my possession. Because I don't know when  
20 was the last time you applied for a job, but  
21 you don't keep the applications the way we  
22 used you used to like in the '90s if you  
23 applied by fax. So I don't have my  
24 application. What you get back, I do have  
25 proof of having applied, because you get



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2 back a confirmation, thanks for applying for  
3 general counsel of blank or products  
4 liability at Amazon. So that's what I have.  
5 I do have proof of application, but you no  
6 longer keep your application.

7 Q. So you have copies of the proof of  
8 submission?

9 A. Yes, it is all through on-line  
10 portals. So what you get back is just an  
11 e-mail confirmation saying thank you for  
12 your application, bla, bla, bla, we will be  
13 in touch soon. That I can produce.

14 MR. BLUMETTI: I am going to call  
15 for the production to the extent that  
16 it was not already produced.

17 Q. Other than the interviews that you  
18 participated in the City of Rochester, did  
19 you participate in any other interviews in  
20 response to these applications?

21 A. Yes, there was one in Rochester,  
22 in Seattle University, another job with the  
23 City of Miami. There have been like maybe  
24 five or six. And those will all be on that  
25 list I can provide. If there was an

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2 interview, it will say it. There have not  
3 been many, I would say half a dozen.

4 Q. Were you offered a job following  
5 any of these interviews?

6 A. The only one was the VA one.

7 I think that one is because they  
8 needed so many attorneys, they literally  
9 hired hundreds of us, because it is  
10 reviewing the appeals, when a veteran  
11 appeals the rejection of benefits, they are  
12 literally hiring hundreds of attorneys for  
13 that role. So I don't think they cared that  
14 much, she worked for Trump, sure, we need  
15 bodies kind of job.

16 Q. It is your testimony that your job  
17 at the VA was the only job that you have  
18 been offered since your termination of  
19 employment with America First?

20 A. Yes, that's the only -- I mean, I  
21 would not have turned down any job. The  
22 Seattle one went to the third round. Yes,  
23 that's the only one.

24 Q. Did there come a time when you  
25 became involved in a Family Court proceeding

1 A. DELGADO

2 with Jason?

3 A. He filed one in July of 2017.

4 Q. What is the venue of that  
5 proceeding?

6 A. Miami Dade.

7 Q. Is that proceeding still pending?

8 A. It is. It was supposed to go to  
9 trial in 2019, and he moved it to go to a  
10 substance abuse rehabilitation center in  
11 Virginia. And then two other trials we have  
12 not been able to do, because he won't sit  
13 for his deposition, and so on and so on.

14 Q. Have any of those delays been  
15 attributable to you or only to Jason?

16 A. He claims they are attributable to  
17 me, because I don't move forward going to  
18 trial without his deposition. That's the  
19 kind of tactics at play.

20 Another trial we couldn't move  
21 forward because by law you have to file your  
22 financial affidavit with the court, he  
23 refused to file it because he didn't want  
24 his financials in public view. So we  
25 couldn't move forward, that type of thing.

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2 But then if I don't move forward,  
3 I am accused of well, you are the one that  
4 wouldn't move forward.

5 Q. Has the court accused you of not  
6 moving forward?

7 A. The reason being, because he has  
8 an attorney who has been paid over \$500,000  
9 on the case. And this case is his life. So  
10 he files a lot of things and spends a lot of  
11 time trying to convince the Court that the  
12 mom who is just trying to keep up is the one  
13 who is at fault.

14 Q. Have you been deposed in  
15 connection with the court proceeding?

16 A. Three times. And Miller has only  
17 deposed for half a deposition and has filed  
18 nine motions for protective order to avoid  
19 the continuation of that deposition.

20 Q. During your deposition, did you  
21 give any testimony regarding your work for  
22 the Campaign or Transition?

23 A. Which deposition?

24 Q. Any of the three.

25 A. Did I give testimony about my work

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for the Campaign?

Q. Or Transition?

A. I don't know if they asked about that much, probably just dates. I can't recall, I don't think they would have gone into it that much. It is not of interest to the case much.

Q. Did you give any testimony regarding your claims in this lawsuit?

A. No. I really tried to separate the two. I don't think this lawsuit has anything to do with that one.

Q. Have you provided any sworn statements or affidavits in connection with that Family Court proceeding?

A. I am sure at one point I filed affidavits or whatnot. I don't recall with specificity.

Q. Did you give any testimony regarding your employability in connection with the Family Court proceeding?

A. I think I have been asked about employability, yes.

Q. What did you testify to in that

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2 respect?

3 A. Gosh, I wish I could remember. It  
4 depends, like what would the question be  
5 that you are envisioning, when you say  
6 employability, like how many jobs I applied  
7 to?

8 Q. Right, anything that goes to that.

9 A. That is pretty broad. I have  
10 talked to the court about the number of jobs  
11 applied to, what jobs I have searched for.

12 Q. Did the Family Court ever make any  
13 findings regarding your employability?

14 A. Oh, recently the court said that I  
15 could -- Miller paid \$5,000 to a vocational  
16 expert to come and testify that in her  
17 opinion I am employable. And her example  
18 was that I could get a job, for instance  
19 with Airbnb in-house paying \$200,000 a year,  
20 lo and behold after the hearing, I applied  
21 for that very Airbnb job. Do you think I  
22 got it? Of course not.

23 They paid her \$5,000, and she  
24 testified very well on the stand, and as a  
25 result the judge said based on her testimony

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he believes I should be working, even though Miller doesn't pay me child care and repeated income to me. One has to laugh to not cry at the injustice of this.

Q. Who is representing you in connection with that Family Court proceeding?

A. A wonderful attorney named Laline Concepcion-Veloso, L-A-L-I-N-E, C-O-N-C-E-P-C-I-O-N-V-E-L-O-S-O.

Q. Where is her office located?

A. Miami Lakes.

Q. Would she have a copy of your deposition transcripts that you referenced before?

A. I think one of them. They never gave us the transcript. These cost money, these transcripts, so unless they ordered them. I think we have a recent one, because I think they used it as an exhibit, so we might have one of them.

Q. How about any of the sworn statements that you submitted, would your attorney have copies of those?

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2 A. I should note, by the way, I am  
3 not sure to what extent, I would like to  
4 preserve some sort of objection that I don't  
5 think -- given that Miller currently works  
6 for you, for the Campaign, I am not sure it  
7 is appropriate for this line of questioning  
8 to be fixing the two. Because then this  
9 litigation could be used to help that one  
10 and vice versa.

11 Q. Your attorney is present to  
12 interpose any objections on your behalf or  
13 you can as well. I am just asking who is in  
14 possession of any of the transcripts. In  
15 the testimony that you gave, I believe you  
16 said your attorney. Are you in possession  
17 of those transcripts?

18 A. I think my attorney is. But  
19 again, Trump World has been caught assisting  
20 Miller in hiding, the Campaign source  
21 specifically, Mr. Blumetti, in helping  
22 Miller hide income from William by hiding  
23 his campaign salary. I fear that this  
24 deposition has currently taken the turn of a  
25 line of questioning that is being used to



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help Miller in a separate proceeding which further harms me or vice versa. And I respectfully ask that you keep the two separate. My child has nothing to do with the claims made here specifically.

Q. I am not asking you any questions about your child?

A. No, but that litigation affects my son and his well-being. So I don't think it is appropriate that the two are mixed. As it is, the Save America PAC has already been caught paying for Miller's legal costs in my family law litigation. I don't know why that is, as if not enough harm has been caused to me.

I mean, at one point Miller and the family law litigation, I will give you a perfect example, said he didn't want to disclose his financials to me, because then those financials were going to be used to investigate to identify if he had enough money to pay out a sexual harassment lawsuit if it were going to go that way. And the judge said yes, we don't want one litigation

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2 to be used to assist the other one, that's  
3 unfair, so.

4 MR. PHILLIPS: We are almost done.  
5 Try to answer the questions. I didn't  
6 object. And I will explain, because he  
7 was asking about transcripts that may  
8 or may not be related.

9 THE WITNESS: I know.

10 Q. Are you alleging that the  
11 defendants' conduct in this case had any  
12 mental or emotional impact on you?

13 A. Yes, most certainly, and on my  
14 child.

15 Q. On the time that you were working  
16 for the Campaign and Transition team, are  
17 you alleging that it had a mental or  
18 emotional impact on you at that time?

19 A. At that time and ever since then.

20 Q. So let's break down the two  
21 different time periods?

22 A. Okay.

23 Q. That time period during which you  
24 were working for the Campaign and  
25 Transition, let's call that August 16 to

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2 inauguration?

3 A. Okay.

4 Q. What sort of impact did the  
5 defendants' conduct have you on during that  
6 time period?

7 A. The discrimination alleged, the  
8 pregnancy discrimination?

9 Q. Correct, during that time period?

10 A. I can't begin to put that into  
11 words. I don't wish on my worst enemy what  
12 it is like to be pregnant, to be told by the  
13 guy, terminate it. And that's not the  
14 defendants, I am getting there. To be  
15 pregnant, to be completely hung out to dry  
16 after you were Trump's, and you should  
17 research this for yourself, Trump's earliest  
18 most steadfast, most hard core defender that  
19 there was in the country, the person who did  
20 the most for him, who did the all the hits  
21 that nobody wanted to do on the topics that  
22 nobody wanted to touch. And to have that,  
23 that was mega Trumpism was a baby that I  
24 created. It was my creation, along with  
25 others. But I lead the charge, I was

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2 considered the queen of it.

3 And on top of that, then to be  
4 pregnant with an actual baby. And that's  
5 when I most need a job, because I am now a  
6 single mom and I have to provide for my  
7 child, to have that, it is worse than a  
8 horrible movie, how scary that was. Even  
9 those calls with Sean, I was like even the  
10 stress of like don't get stressed, you can't  
11 get stressed, because there is literally  
12 something wrong with the baby if you are  
13 stressed. And I kept thinking of the  
14 months, two months now, three months now,  
15 how is the baby forming? To cause that much  
16 stress on a woman who is already 39, it is  
17 already a high risk pregnancy, no one  
18 deserves that, not my worst enemy. And then  
19 to live it, it is like a nightmare that  
20 never ends, because I constantly -- then I  
21 had to live through seeing people who did  
22 nothing for Trump, people who were  
23 anti-Trump get the jobs that were mine. It  
24 was like a bad dream. To watch the people  
25 who spent the vast majority of that election

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2 against him, suddenly strut around, were the  
3 White House. And me, the one who did the  
4 most is back home in a twin bed in little  
5 Havana and pregnant and has nothing when I  
6 most need it. And my son is autistic now.  
7 And I have no doubt it is because the  
8 stress. He is on the level of a 3 year old  
9 boy, when he is almost 6. And I know it was  
10 the stress. We have done the testing, it is  
11 not in my genes, it is not hereditary. And  
12 I asked the geneticist, she said if you had  
13 a stressful pregnancy, that's one of the  
14 main causes.

15 Q. Anything other than stress that  
16 you could speak to?

17 A. Just I was finally, everything I  
18 have worked for since I was a little girl --  
19 people like me are not supposed to go to  
20 Harvard Law School. My mom worked in a  
21 factory, my dad is a retired bus driver. I  
22 was made fun of in high school for being  
23 poor. Finally after all these years I was  
24 headed to the White House. I was going to  
25 help run the country and serve my country

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2 and fly on Air Force One and advise the  
3 president, everything had finally fallen  
4 into place. And the same minute it fell  
5 into place, it was taken from me. I never  
6 even had a single second to enjoy it. I had  
7 one week to enjoy between election and  
8 telling Miller that I was pregnant, at which  
9 point it was very like clear that this was  
10 not headed in a good direction.

11 I can't tell you how horrible it  
12 is to watch people get the job that you  
13 created and that was owed to you, and watch  
14 other people who did everything they could  
15 to stop Trump from becoming president take  
16 those jobs instead. It was the worst irony,  
17 the irony of it is what kills.

18 And to be pregnant and know I need  
19 a job because I need to feed this baby, I  
20 need to give him a cute little house. I am  
21 not a materialistic person, but I need to  
22 have income so we could get a cute house in  
23 Virginia, and so he could have a normal  
24 life. And that's the one time, you are  
25 screwed now, not only can you never probably

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A. DELGADO

2

get a legal job again, but you don't have  
3 the White House job either. Every door is  
4 shut, and you have a baby. I just don't  
5 know why that was done to me, a woman with a  
6 baby. Why not just be civil, be civil?  
7 Even now, look at this, six years later,  
8 still refusing. No one deserves this.

9

Q. I understand the stress that you  
10 are attributing --

11

A. Sorry, sorry.

12

Q. Do you attribute the stress to  
13 Jason or do you attribute the stress to  
14 Reince, Sean and Steve?

15

A. No, it is to the Campaign and the  
16 defendants. Because what Jason did was  
17 horrible. But if others had said A.J., we  
18 are with you and you have your White House  
19 job, and here is some press jobs or policy  
20 jobs and we are with you all the way, and  
21 your baby is going to have support and you  
22 are going to have a job, what Jason did  
23 wouldn't matter. That was not the stress,  
24 it was being without a job. What he did  
25 could have been nullified by the right acts.

1 A. DELGADO

2 It has been six years of hell,  
3 living in hell ever since then.

4 Q. Are you saying that the stresses  
5 continued after you stopped working for the  
6 Campaign and Transition?

7 A. Yes, because I still feel the  
8 effects of the rejection of that job.

9 Q. Do you attribute this to anything  
10 going on in your personal life, such as your  
11 family court proceeding with Jason?

12 A. No, because even that, if I had my  
13 job, that's it, I have gotten used to it, it  
14 is what it is. I have a good attorney.  
15 That's caused aggravation, but not hell am I  
16 cursed type of stress, or how could this be  
17 happening or how could this have happened to  
18 me type of stress or how am I going to  
19 provide for my baby type of stress. That's  
20 more aggravation.

21 Q. Has your stress lessened in the  
22 years that have followed?

23 A. In a way no, because the more, the  
24 more I think about -- the more it becomes  
25 clear just what an impact not having that



1 A. DELGADO

2 White House job has had, and continues to  
3 have, it hurts the same. The pain hasn't  
4 subsided, the stress hasn't subsided, the  
5 injustice hasn't subsided.

6 Trump being at Versailles three  
7 days ago a block away from my house, and I  
8 was supposed to be part of that  
9 administration. There are constant  
10 reminders, and there is no way to get away  
11 from it, there is no way to say well, I  
12 worked for Loreal, so let me just mute  
13 Loreal on Twitter and not hear about Loreal  
14 and I'll be able to get over the trauma of  
15 being pushed out of Loreal. There is no way  
16 to push out Trump. It is like a  
17 never-ending nightmare. I can't stop  
18 feeling it. And I am a strong person. But  
19 thinking about my child, especially his  
20 challenges that he has, I should have had  
21 that job or somewhere in the past six years,  
22 somebody should have said you know what, she  
23 is a mom, she has a kid, let's just sort  
24 this out and do right by her. No, keep it  
25 going. After all I did for him, it is the

1 A. DELGADO

2 irony that kills.

3 Q. I want to circle back to your  
4 Interrogatory Responses?

5 A. Okay.

6 Q. In response to Interrogatory 24,  
7 you quantify your allegations of damages.

8 Starting with the alleged lost  
9 wages, which is on the bottom of page 8, so  
10 this is the response to the allegations of  
11 damages speaking specifically about lost  
12 wages. At the bottom of the page, you have  
13 estimated that as a result of the loss of a  
14 White House Communications position, at  
15 least two years worth of salary or at least  
16 \$360,000. What is your factual basis for  
17 alleging that you would have been paid at  
18 least \$180,000 a year in the White House?

19 A. I think we looked at my  
20 counterparts salary. And that's the range  
21 that they were. The White House salaries  
22 are public.

23 Q. How much did the Press Secretary  
24 make in 2017?

25 A. I don't have that number committed

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to memory.

Q. Do you know whether it was more or less than 180,000?

A. I would say it is probably right around that figure. But at a certain level, the Press Secretary and the other advisers kind of all make the same.

Q. In response to this interrogatory, you say that you would have been able to move into a higher-earning position as you had an employment in the White House, such as a senior position, perhaps as a Cable news commentator or a political campaign operative, in any of these scenarios, you would have easily earned over a million dollars per year.

What is your factual basis for alleging that you would have earned seven figures simply by working in the White House?

A. I don't think I am saying \$1 million for the White House.

Q. It says, had you worked in the White House, you would have almost certainly

1 A. DELGADO

2 moved on to a higher earning position?

3 A. Yes.

4 Q. My question to you is, what is  
5 your factual basis for alleging that you  
6 could have earned a million dollars simply  
7 by the fact of having worked in the White  
8 House?

9 A. Simple, it is the White House  
10 combined with the fact that I was what is  
11 called a Trump originalist, which the media  
12 companies were especially desperate for,  
13 because there were maybe four of us in the  
14 world or five. You take a look at somebody  
15 like Boris, who left the White House and  
16 then got a \$600,000 a year job with  
17 Sinclair, even though, not to disparage  
18 Boris, but there is not anything like  
19 particularly interesting or appealing about  
20 him. He doesn't come across in any nice  
21 fashion when he is doing hits.

22 Q. That was sort of my next question,  
23 are you aware of any individuals who worked  
24 in the White House in either '17, '18, '19  
25 or '20, who went on to earn over a million

1 A. DELGADO

2 dollars a year?

3 A. Alyssa Griffin was on The View.  
4 They were literally so desperate for like a  
5 Trump person. They don't even know who to  
6 hire. Stephanie Grisham was considered for  
7 that role. And that pays way over a million  
8 dollars a year.

9 There are Fox News media  
10 contracts, especially for a former Trump  
11 White House, and Trump originalist on top of  
12 that, would have been in that ballpark.

13 Who else? You could write a book  
14 as Cliff Sims did, who was very junior, but  
15 went into the White House. And then came  
16 out after a year and a half or so, and was  
17 paid a million dollars advance on his book,  
18 a seven-figure advance for his book, Team of  
19 Vipers, I think it was called, and then went  
20 to work on the PAC.

21 Boris Cartly (phonetic), there was  
22 just a New York Times article about this, a  
23 couple of months ago, Boris makes over a  
24 million dollars year, doing what? As a  
25 consultant to various campaigns, just based

1 A. DELGADO

2 on his proximity to Trump and the fact that  
3 he served in the White House. People want  
4 to hire those people who are like Trump OGs,  
5 as they are called.

6 Q. I was just curious, you had  
7 testified earlier that you lost out on jobs  
8 specifically because of your orbit to Trump  
9 World and the toxicity of Trump, so how do  
10 you distinguish your experiences from the  
11 experiences you are encountering now?

12 A. On legal jobs I missed out on, on  
13 corporate world jobs. These are not  
14 corporate world jobs, these are media or  
15 political jobs.

16 Q. Did you apply for any media or  
17 political jobs?

18 A. They are not jobs you apply for,  
19 it is not like they post an opening on  
20 indeed.com that they are looking for a Fox  
21 News commentator. Those are jobs that are  
22 kind of offered to you.

23 Q. So you were saying that a legal  
24 job, your prior history working for the  
25 Campaign is considered toxic for those jobs?

1 A. DELGADO

2 A. I am sorry?

3 Q. I am trying to understand and  
4 differentiate before you talked about the  
5 fact that you literally walked out of the  
6 City of Rochester, because they asked about  
7 your prior experience working for the Trump  
8 Campaign. But now you are saying that these  
9 individuals who worked in the White House  
10 for the Trump administration went on to make  
11 seven figures, just by virtue of the fact  
12 working for the White House, there seems to  
13 be some inconsistency that I am trying to  
14 understand?

15 A. No inconsistency at all. For  
16 regular legal jobs in corporate America, the  
17 Trump association is toxic. For a media job  
18 or a job, say, on The View, where they are  
19 looking for a person who served in the Trump  
20 administration or Fox News or someone to  
21 write a book or someone to start a  
22 consultancy group, where a campaign will pay  
23 \$20,0000 a month just to have you on  
24 retainer, and you get ten different  
25 campaigns that will pay you that like Boris

1 A. DELGADO

2 is doing, the Trump thing is a big plus. It  
3 is for the regular day jobs, legal jobs that  
4 I said it is toxic.

5 Q. Just moving along further in the  
6 response, you said that you reasonably  
7 anticipated reaching a book deal along the  
8 lines of other Trump spokespersons and  
9 representatives, which conservatively would  
10 have been worth another \$2 million. Have  
11 you spoken to any publishers regarding the  
12 value of that book deal?

13 A. Yes, I specifically got that  
14 figure from -- and I wish I had her name  
15 committed to memory. I talked to her in  
16 Miami Beach. And she was here from New York  
17 for the season. We had lunch at the Setai,  
18 I think it was like a few months after I had  
19 given birth. And she explained it would be  
20 difficult without my having gone into the  
21 White House to write the book, because now  
22 the book deals were Trump administration,  
23 the story, not Trump Campaign, the story,  
24 which was now yesterday's news.

25 And she said mine would be worth X



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2 because -- which was 2 million, I thought,  
3 oh, that sounds high. But when I saw that  
4 Cliff got one for 1 million, even though he  
5 was very junior, and didn't really have much  
6 to share. She said mine had a story of like  
7 affair, pregnancy, stuff that sells, she  
8 said. She said that type of story was  
9 relatable, interesting, it is the kind of  
10 thing people want to read. And that woven  
11 into what she called the most exciting and  
12 bizarre Campaign in American history was,  
13 quote, publishing gold. And she thought,  
14 she estimated it would be an advance of  
15 approximately 2 million. This makes sense  
16 because Kellyanne Conway's I read was  
17 5 million or more. I don't know, it was  
18 really high. So then the 2 million didn't  
19 seem that high after all, when I saw that.  
20 Then I was like I guess she knew what she  
21 was talking about.

22 Q. What was the name of the  
23 individual that you met with in Miami Beach?

24 A. I will try to go back and see if I  
25 could trace my steps. This was in late

1 A. DELGADO

2 2017. So it has been a while. I am trying  
3 to think who connected us for lunch.

4 Q. Do you know who she has worked  
5 for?

6 A. She does like publishing, she does  
7 not work out of a publishing house. She is  
8 like a publishing agent. I am going to go  
9 back and try to retrace my steps and find  
10 her name. It is just that it has been such  
11 a long time.

12 She said the whole affair thing,  
13 and I remember she used Monica and Bill as  
14 an example, like people like to read about,  
15 quote-unquote, scandalous situations.

16 Q. You say here, Now, however,  
17 plaintiff is only able to earn about 75,000  
18 per year for five years?

19 A. I aimed high, because the VA job  
20 was 60, so.

21 Q. How do you know that's the ceiling  
22 of your earning capacity, Ms. Delgado?

23 A. Well, Mr. Blumetti, after six  
24 years of rejection letters, I wish I could  
25 tell you that that is me being pessimistic,

1 A. DELGADO

2 but it is not. I really fear where I am  
3 going to end up is like doing document  
4 review.

5 Q. Have you researched the current  
6 market salary range in Florida for a Harvard  
7 educated lawyer?

8 A. Well, I don't have a Florida  
9 license. I have never taken the Florida  
10 Bar.

11 Q. Is that something you intend to  
12 do?

13 A. It is very hard with a child to  
14 sit and study for a Bar exam.

15 Q. Have you researched the current  
16 marked salary range for a Harvard-educated  
17 lawyer in New York?

18 A. Well, it would require mine living  
19 in Manhattan, and given that I can't afford  
20 to live in Manhattan. I did try using my  
21 New York bar license for positions in  
22 Upstate New York, hence the Rochester.  
23 Another example is that a friend of mine  
24 connected me with a guy who has a big crypto  
25 company in Buffalo. And I e-mailed him.

1 A. DELGADO

2 And right away I thought the e-mail went  
3 well, because I made a Ted Lasso reference,  
4 and he loved Ted Lasso, and I thought this  
5 is going well. Then he got back to my  
6 friend, and he said did you Google her  
7 before, are you aware of all the Trump  
8 stuff? And that was that.

9 I did try to use it Upstate New  
10 York, non-Manhattan, where I could afford to  
11 live. And those places tend to be quite  
12 liberal and quite blue, and they won't give  
13 me a second glance.

14 Q. Did you settle your claims with  
15 the Transition team?

16 A. Yes, I think Dan and Abe did like  
17 a small settlement with them.

18 Q. Why did you decide to settle your  
19 claims with the Transition team?

20 A. To the extent I am allowed to say  
21 that, it is not an attorney/client  
22 privilege, they had said that they were  
23 wrapping up, and they had no funds left.  
24 And so either we took either the little  
25 paltry amount that they had left, or they

1 A. DELGADO

2 were going to petition the judge to force us  
3 to take the paltry amount.

4 Q. How much money were you paid in  
5 connection with that settlement?

6 MR. PHILLIPS: We could probably  
7 have this conversation off the record.

8 MR. BLUMETTI: I could represent  
9 by counsel that the actual agreement  
10 was produced by court order.

11 MR. PHILLIPS: Was it?

12 MR. BLUMETTI: I have it. I  
13 understand the amount. What I am  
14 trying to get out is how much of that  
15 amount you were paid as opposed to your  
16 attorneys.

17 MR. PHILLIPS: I would probably  
18 object to that.

19 Q. Did you receive any portion of  
20 that settlement?

21 A. I don't see how that would be  
22 relevant to the litigation.

23 Q. It is certainly relevant in  
24 speaking to Mr. Phillips, to the extent it  
25 would be considered an offset should there

1 A. DELGADO

2 be any award of damages?

3 MR. PHILLIPS: We could deal with  
4 offset, that's a separate issue.  
5 Attorney fee, particularly prior  
6 counsel, is something that I don't want  
7 to touch, because there is privilege  
8 within that, depending upon the State  
9 and everything else.

10 Q. Let me just ask this, Ms. Delgado,  
11 did you obtain any portion of that  
12 settlement?

13 A. What?

14 Q. Did you obtain?

15 A. No, it went for fees.

16 Q. So you did not obtain any portion  
17 of that settlement?

18 A. Did the Transition team pay me any  
19 portion of the settlement?

20 Q. Correct, that settlement number  
21 that which we are aware of, I am asking did  
22 you personally receive --

23 A. I did not. So it is like a fight  
24 over nothing.

25 Q. Have you ever accused any other

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businesses or entities of discriminating or  
retaliating against you?

A. No. I never sued anyone.

Q. That was my next question, have  
you ever filed any civil lawsuits against  
anyone?

A. No. You could check dockets.

Q. Have any individuals, aside from  
John De Neufville, ever initiated any civil  
lawsuits against you?

A. No, never been sued.

Q. Have any individuals ever accused  
you of discrimination or retaliation?

A. No.

MR. BLUMETTI: I am thinking that  
would be the logical conclusion of the  
day. If you could give me another five  
minutes to let me look back at my notes  
to see if I have any other lines of  
questions, I appreciate the  
opportunity.

We could go record for a few  
minutes.

THE VIDEOGRAPHER: We are off the

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record. The time is 5:13 eastern time.

(Whereupon, a short recess was  
taken.)

THE VIDEOGRAPHER: We are back on  
the record. The time is 5:20 p.m.  
eastern time.

MR. BLUMETTI: Ms. Delgado, I have  
no further questions. I appreciate  
your time today.

THE WITNESS: Thank you.

MR. PHILLIPS: No questions. And  
we will elect to read and sign.

THE VIDEOGRAPHER: We are off the  
record at 5:20 p.m.

This concludes today's testimony.

Thank you and take care.

(Whereupon, at 5:20 P.M., the  
Examination of this witness was  
concluded.)

° ° ° °



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1 A. DELGADO

2 D E C L A R A T I O N

3  
4 I hereby certify that having been first  
5 duly sworn to testify to the truth, I gave  
6 the above testimony.

7  
8 I FURTHER CERTIFY that the foregoing  
9 transcript is a true and correct transcript  
10 of the testimony given by me at the time and  
11 place specified hereinbefore.

12  
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15 \_\_\_\_\_  
16 ARLENE J. DELGADO

17  
18 Subscribed and sworn to before me  
19 this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_.

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22 \_\_\_\_\_  
23 NOTARY PUBLIC

A. DELGADO  
E X H I B I T S

DEFENDANT'S EXHIBITS

| EXHIBIT<br>LETTER | EXHIBIT<br>DESCRIPTION                      | PAGE |
|-------------------|---|------|
| Exh A             | 16-page document DEF<br>132 through DEF 147 | 32   |
| Exh B             | E-mail Bates stamped<br>DEF 2221            | 35   |
| Exh C             | E-mail Bates stamped<br>DEF 2227            | 40   |
| Exh D             | E-mail Bates stamped<br>DEF 2240 to 2241    | 43   |
| Exh E             | E-mail Bates stamped<br>DEF 2253            | 47   |
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Exh V E-mail Bates stamped 235  
DEF 1297

Exh W E-mail Bates stamped 245  
DEF 1542 to 1543

Exh X E-mail Bates stamped 258  
Def 1986 to 1990

Exh Y One-page e-mail DEF 842273

Exh Z Plaintiff's Response 277  
and Objections  
to Defendant's First Set  
of Interrogatories  
(Exhibits retained by court reporter)

## I N D E X

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INFORMATION AND/OR DOCUMENTS PAGE

Any writings that you sent to the 64  
Florida Court for any anticipated  
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Ms. Delgado

E-mail confirmation showing job 317  
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A. DELGADO

C E R T I F I C A T E

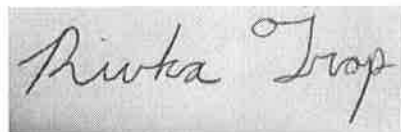
STATE OF NEW YORK )  
: SS.:  
COUNTY OF QUEENS )

I, RIVKA TROP, a Notary Public for and  
within the State of New York, do hereby  
certify:

That the witness whose examination is  
hereinbefore set forth was duly sworn and  
that such examination is a true record of  
the testimony given by that witness.

I further certify that I am not related  
to any of the parties to this action by  
blood or by marriage and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set  
my hand this 29th day of June, 2023.



RIVKA TROP

ERRATA SHEET  
VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: Delgado, Arlene v. Donald J. Trump For  
DATE OF DEPOSITION: 6/15/2023  
WITNESSES' NAME: Arlene J. Delgado

| PAGE | LINE (S) | CHANGE | REASON |
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Arlene J. Delgado

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\_\_\_\_\_  
(NOTARY PUBLIC)

\_\_\_\_\_  
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[&amp; - 2004]

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[instantly - ivanka's]

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[speak - start]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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